

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>not inspected</i>	808.121(a)
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used:	722.120(d)
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>none</i>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

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	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b>	
30	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<i>Inspected selected areas see Report see Narrative</i> 722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.134 Accumulation Time</b>	
(722.134(a))	Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>Does not apply</i>	<i>Does not apply</i>
	and/or	
	B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>no tanks 5/18/6</i>	<i>no tanks 5/18/6</i>
	and/or	
	C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>no drip pads 5/18/6</i>	<i>no drip pads 5/18/6</i>
	and/or	
	D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>no containment bldgs. 5/18/6</i>	<i>no containment bldgs. 5/18/6</i>
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>no tanks 5/18/6</i>	<i>no tanks 5/18/6</i>
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	



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(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:  <i>Inspected selected areas - see Report Narrative.</i></p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts A, B, and C of Part 725?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:  <i>not applicable OK DMS</i></p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If "No", go to Subpart C.</p> <p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	<p><i>not applicable</i></p>
(725.211)		725.211
(725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	<p><i>not applicable no tanks DMS 5/18/16</i></p>

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(725.291(a))	For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____  *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____  <b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For <b>new</b> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

*Not tanks  
not applicable  
DMS 5/18/88*



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(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?  Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?  Yes _____ No _____ N/A _____</p> <p>or  if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?  Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A _____</li> <li>placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift?  Yes _____ No _____ N/A _____</li> <li>provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A _____</li> <li>sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A _____</li> </ol> <p>and  is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>a liner (external to the tank); or</li> <li>a vault; or</li> <li>a double-walled tank; or</li> <li>an equivalent device (approved by the Board)?</li> </ol> <p>Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A _____</p>	

*No tanks  
not applicable  
DMS  
5/18/6*

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(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p><b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

*No tanks  
not applicable  
DMS  
5/18/16*



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(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?  Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection?  Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?  Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release?  Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

*no tanks  
not applicable  
DMS 5/18/16*

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(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:  - the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?  Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?  Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?  Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p><b>Section 725.302 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?  Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

*no tanks  
not applicable  
DMS 5/18/16*



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(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b> Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

*Reviewed Rock Island Arsenal  
SPC & C Plan & Installation Spill  
& RCRA  
Contingency  
Plan  
Rev. 2005*

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> <li>- police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	<p><i>Note: on site police, fire, medical</i></p> <p><i>on site backup @ all time</i></p> <p><i>on site specific</i></p> <p><i>Being revised to match new "template"</i></p>
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> <li>- description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> <li>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>b) submitted to: <ul style="list-style-type: none"> <li>- police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> </li> </ul>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> <li>a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- communications or alarm systems?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- shutdown of operations?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	<i>from Pearson goes to Environmental Resource Center</i>
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation	
(728.107(a)(5))	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	<i>No prohibited waste treatment</i>	
722.134(c)	<b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <u>acutely</u> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <u>acutely</u> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of <u>acutely</u> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>		<i>manage the satellite but all are &lt; 90 day storage areas</i>
722.134(g)	<b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.		
	<b>SUBPART D: RECORDKEEPING AND REPORTING</b>		
722.140(a)	<b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____		722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)	
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)	
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)	
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.141(a)	
	<b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.		



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>none from state CEI</i>	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>none from state CEI</i>	722.142(a)(1)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>Corrective Action Reports</i>	722.142(a)(2)
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>  COMMENTS:	722.160
		722.170

TM:jab\722LQG.doc

7000 1448 1256

**U.S. EPA**  
**77 W. Jackson Blvd**  
**Chicago, IL 60604**  
Attn: Diane Sharrow

Postage	\$ 12.49
Certified Fee	2006 1.85
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

5.12  
Frances Pearson, Hazardous Waste  
1 Rodman Avenue  
Rock Island Arsenal  
Rock Island, IL 61299-5000

For an address endorsement, if a possible at receipt  
IMPORT  
PS Form



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Frances Pearson, Hazardous Waste Manager  
1 Rodman Avenue  
Rock Island Arsenal  
Rock Island, IL 61299-5000

2. A

(Tr

vice label)

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

*M. Carlson*

B. Date of Delivery

*6-14-06*

C. Signature

X

*M. Carlson*

☒ Agent

☐ Addressee

Is delivery address different from item 1?

☐ Yes

Enter delivery address below:

☐ No

Service Type

☒ Certified Mail

☐ Express Mail

☒ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7001 0320 0006 1448 1256

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA  
77 W. Jackson Blvd.  
Chicago, IL 60604  
Attn: Diane Sharrow

DE-9J



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF LAND / FIELD OPERATIONS SECTION

## RCRA INSPECTION REPORT

### GENERAL FACILITY INFORMATION

USEPA ID #:	IL521002183	BOL ID #:	1618130001
Facility Name:	Rock Island Arsenal	Phone #:	309/782-6001
Location	AMSTA-RI-PWN Bldg. 102	County:	Rock Island
City:	Rock Island	State:	IL
		Zip Code:	61299-5000
Region:	3-Peoria	Inspection Date:	09/21/2005
		Time:	8:00 a.m. - 12:00 p.m.
Weather:			

### TYPE OF FACILITY

Notified As:	Generator	Regulated As:	Generator
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### TYPE OF INSPECTION

CEI:	<input checked="" type="checkbox"/>	CME/O&M:	<input type="checkbox"/>	CSI:	<input type="checkbox"/>	NRR:	<input type="checkbox"/>	CCI:	<input type="checkbox"/>	PIF:	<input type="checkbox"/>	CVI:	<input type="checkbox"/>	CSE:	<input type="checkbox"/>	CAO:	<input type="checkbox"/>
FUI to:	Other:																

### NOTIFICATION INFORMATION (EPA 8700-12)

Notification Date:	08/18/1980	(initial)	(subsequent)
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### PART A PERMIT INFORMATION (EPA 3510-3 OR EPA 8700-23)

Part A Date:	Amended:	Withdrawn:
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### PART B PERMIT INFORMATION

(Check one if applicable) Application Submitted?	<input checked="" type="checkbox"/>	Permit Issued?	<input type="checkbox"/>	Part B Permit Denied - 11/30/92
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### ACTIVE ENFORCEMENT

Date facility referred to:	USEPA:	IAGO:	County State's Attorney:
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### ACTIVE ENFORCEMENT ORDERS

CACO:	CAFO:	Federal Court Order:
Consent Decree:	IPCB Order:	State Court Order:

## TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	On Part B?	Activity ever done?	Closed?	Being done during inspection?	Exempt per 35 IAC Sec:	On Annual Report:		
S01	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### OWNER

### OPERATOR

<b>Name:</b> Rock Island Arsenal	<b>Name:</b> Rock Island Arsenal
<b>Address:</b> AMSTA-RI-PWN Bldg. 102	<b>Address:</b> AMSTA-RI-PWN Bldg. 102
<b>City:</b> Rock Island	<b>City:</b> Rock Island
<b>State:</b> IL <b>Zip Code:</b> 61299-5000	<b>State:</b> IL <b>Zip Code:</b> 61299-5000
<b>Phone #:</b> 309/782-6001	<b>Phone #:</b> 309/782-6001

### PERSON(S) INTERVIEWED

### TITLE

### PHONE #

Fran Pearson	Hazardous Waste Manager (contact person)	309/782-7907
Steve Clark	Supervisor of the Environmental Division	
Merle Arensdorff	Engineering Technician	
Chuck Swynenberg	Environmental Coordinator	
Nathan Klett	Environmental Engineer	

### INSPECTION PARTICIPANTS

### AGENCY/BUREAU

### PHONE #

John Tripses *	IEPA/BOL	309/693-5462

\*Report prepared by this person.

## SUMMARY OF APPARENT VIOLATIONS

AREA	SECTION	X
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

AREA	SECTION	X
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

AREA	SECTION	X
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

X = CONTINUING VIOLATIONS



## HAZARDOUS WASTE DISPOSITION FORM

Facility Name:	Rock Island Arsenal								USEPA ID #:	IL5210021833		
Inspection Date:	September 21, 2005								IEPA ID #:	1618130001		
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Form 8700-12	On Part A or Part B?	On Annual Report for Years:			Amount On-Site	Generation Rate (2004 AR)	Last Manifest Date	Disposition
						2004	2003	2002				
Soil Cuttings	Closure Of Building 66		D007						7 drums			
Decon Water	Closure Of Building 66		D007						1 drum			
Development Water	Closure Of Building 66		D007						1 drum			
Filters With Chrome	MOP Shop		D007						3 drums			
Kadizid Brightener KR	Unused Material		D001, U002						5 drums			
Formula Q Sealant	Unused Material		D001						2 drums			
Acetic Acid	One Time		D001, D002			X				15 lbs.	12/17/2004	WID988580056
Adhesives	Base Operations		D001			X	X	X		91 lbs.	06/27/2005	WID988580056
Aerosols	Base Operations		D001, D035, U226, U228			X	X	X		353 lbs.	06/27/2005	WID988580056
Anhydrous Ammonia	One Time		D002			X				155 lbs.	12/21/2004	IND000646943
Antifreeze With Lead	Vehicle Maintenance		D008			X	X	X		967 lbs.	06/24/2004	WID988580056
Aqueous Brake Solution	Vehicle Maintenance		D039, D040			X	X	X		6,259 lbs.	08/23/2005	ILD980613913

## HAZARDOUS WASTE DISPOSITION FORM

Facility Name:	Rock Island Arsenal								USEPA ID #:	IL5210021833		
Inspection Date:	September 21, 2005								IEPA ID #:	1618130001		
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Form 8700-12	On Part A or Part B?	On Annual Report for Years:			Amount On-Site	Generation Rate (2004 AR)	Last Manifest Date	Disposition
						2004	2003	2002				
Bandages	One Time		D001, D002			X				89 lbs.	06/24/2004	WID988580056
Bleach-Oxidizer	One Time		D001			X				73 lbs.	03/25/2004	WID988580056
Calsibar	One Time		D003, D007			X				2,200 lbs.	09/20/2004	IND000646943
Charcoal Filters - Civil Defense	One Time		D007			X				110 lbs.	03/25/2004	WID988580056
Decontamination Fluid	CERCLA Landfill		D008			X				127 lbs.	03/22/2004	WID988580056
Developer	Copier Maintenance		D002			X	X			10 lbs.	10/29/2004	WID988580056
Disinfectant	One Time		D002			X				21 lbs.	03/25/2004	WID988580056
Emission Control Dust	Foundry Operations		D006, D007, D008			X	X	X	1 drum	2,698 lbs.	05/30/2005	WID988580056
Ferric Chloride	One Time		D002			X				19,693 lbs.	05/10/2005	MID980991566
Flammable Liquid/Ethanol/Heptane/Emethylene Chloride	One Time		D001			X				890 lbs.	12/17/2004	WID988580056
Fururyl Alcohol	One Time		D001			X				4,680 lbs.	05/03/2004	WID988580056
Gas And Oil And Water	Base Operations		D001, D018			X				1,100 lbs.	03/25/2004	WID988580056



## HAZARDOUS WASTE DISPOSITION FORM

Facility Name:	Rock Island Arsenal								USEPA ID #:	IL5210021833		
Inspection Date:	September 21, 2005								IEPA ID #:	1618130001		
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Form 8700-12	On Part A or Part B?	On Annual Report for Years:			Amount On-Site	Generation Rate (2004 AR)	Last Manifest Date	Disposition
						2004	2003	2002				
Groundwater And TCEA	CERCLA Waste		F001			X				11,328 lbs.	02/04/2005	MID980991566
Heat Treat Salts	Forge Shop & Heat Treat Shop		D007			X				1,194 lbs.	06/24/2004	WID988580056
Hydroxyl Ammonium Sulfate - Photo Lab	One Time		D002			X				40 lbs.	12/17/2004	WID988580056
Industrial Wastewater Treatment Sludge	Plating Shop		F006			X	X	X		11,604 lbs.	08/29/2005	WID988580056
Landfill Purge Water - Vinyl Chloride	CERCLA Waste		D039			X				385 lbs.	06/28/2005	TXD000838896
Lead Anodes	Plating Shop		D008, D007			X				1,807 lbs.	06/24/2005	WID988580056
Methanol	One Time		U154			X				30 lbs.	10/29/2004	WID988580056
Mkits - Civil Defense	One Time		D001, D009			X				60 lbs.	06/24/2004	WID988580056
Sodium & Potassium Hydroxide - Photo Lab	One Time		D002			X				46 lbs.	12/17/2004	WID988580056
Oil With Trichloroethane	One Time		F001			X				1,341 gal.	06/24/2004	WID988580056

## HAZARDOUS WASTE DISPOSITION FORM

Facility Name:	Rock Island Arsenal								USEPA ID #:	IL5210021833		
Inspection Date:	September 21, 2005								IEPA ID #:	1618130001		
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Form 8700-12	On Part A or Part B?	On Annual Report for Years:			Amount On-Site	Generation Rate (2004 AR)	Last Manifest Date	Disposition
						2004	2003	2002				
Paint Chips With Lead	Paint Removal		D008			X	X	X		2,055 lbs.	12/17/2004	WID988580056
										1,344 lbs.		ILD000608471
										14,800 lbs.		ILD000666206
Paint With Solvent	Painting Operations		D001, D007, F005, D008			X			4 drums	32,228 lbs.	08/29/2005	WID988580056
P-Dichlorobenzene	One Time		U072			X				8 lbs.	12/17/2004	WID988580056
Petroleum Naphtha	Cleaning		D001, D039, D040			X	X	X		2,166 lbs.	10/29/2004	WID988580056
										336 gal		IAD098027592
Phenol Solution	One Time		U188			X				10 lbs.	10/29/2004	WID988580056
Rust Proofing Compound	One Time		D001			X				866 lbs.	03/25/2004	WID988580056
Silver Recovery Solution	Photo Processing		D011			X				1,631 lbs.	04/08/2005	WID988580056
String Waste - Bridge Operation	Bridge Maintenance		D001			X				2,706 lbs.	08/29/2005	WID988580056
Tincture Of Benzoin/Iodine	One Time		D001			X				290 lbs.	10/29/2004	WID988580056
Trichloro-Ethylene	One Time		U228			X				1,600 lbs.	06/24/2004	WID988580056
Acrysol	Base Operation		D001, D018				X				05/03/2003	WID003967148



## HAZARDOUS WASTE DISPOSITION FORM

Facility Name:	Rock Island Arsenal								USEPA ID #:	IL5210021833		
Inspection Date:	September 21, 2005								IEPA ID #:	1618130001		
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Form 8700-12	On Part A or Part B?	On Annual Report for Years:			Amount On-Site	Generation Rate (2004 AR)	Last Manifest Date	Disposition
						2004	2003	2002				
Asphalt Resin Cement	Pavement Operations On Base		D001				X				04/14/2003	WID003967148
Capacitors, Non-PCB	CERCLA Landfill		D001				X				04/14/2003	WID003967148
Cleaning Liquid, Ethanol, Acetic	Parts Washers		D001				X				04/14/2003	WID003967148
Coal Tar Epoxy	Base Operations		D001				X				08/13/2003	TXD074196338
Dead Level Asphalt	Pavement Operations On Base		D001				X				05/22/2003	WID003967148
Developer Prep	Copier Maintenance		D002				X				04/14/2003	WID003967148
Dispersant	Copier Maintenance		D001				X				04/14/2003	WID003967148
Mold Release	Foundry		D001				X				05/22/2003	TXD074196338
Fixer	Copier Maintenance		D002, D005				X				04/14/2003	WID003967148
Floor Sweepings	Plating Shop		D006, D007, D008				X				05/22/2003	TXD074196338
Hydrochloric Acid	CERCLA Landfill		D002				X				09/10/2003	TXD055141378

## HAZARDOUS WASTE DISPOSITION FORM

Facility Name:	Rock Island Arsenal								USEPA ID #:	IL5210021833		
Inspection Date:	September 21, 2005								IEPA ID #:	1618130001		
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Form 8700-12	On Part A or Part B?	On Annual Report for Years:			Amount On-Site	Generation Rate (2004 AR)	Last Manifest Date	Disposition
						2004	2003	2002				
Lead Solids And Powder	Lab		D008				X				04/14/2003	WID003967148
Lime, Sodium Nitrate, Hexachlorethane	Lab		D001				X				10/29/2003	TXD074196338
Methanol	Landfill Clean Up		D001				X				09/10/2003	TXD055141378
Sodium Hydroxide Cleaners	Lab		D002				X				04/14/2003	WID003967148
Nitric Acid	Off-Spec		D002				X				04/03/2003	TXD074196338
Oil W/ TCEA	Marines		F001				X				04/03/2003	TXD074196338
Paint Cans	Various Sources		D001, D035				X				12/29/2003	WID988580056
Paint With Flammable Solvent	Various Sources		D001, D035				X				04/03/2003	TXD074196338
Paint With Solvent	Painting Process		D001, D007, D008				X	X			04/14/2003	WID003967148
Paint Aerosol W/ Chromium	Various Sources		D001, D007				X	X			12/29/2003	WID988580056
Plasticizer	Rubber Department		D002				X	X			8/13/2003	TXD074196338

## HAZARDOUS WASTE DISPOSITION FORM

Facility Name:	Rock Island Arsenal								USEPA ID #:	IL5210021833		
Inspection Date:	September 21, 2005								IEPA ID #:	1618130001		
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Form 8700-12	On Part A or Part B?	On Annual Report for Years:			Amount On-Site	Generation Rate (2004 AR)	Last Manifest Date	Disposition
						2004	2003	2002				
Paint Related Material	Building 299-E		D002, D007				X				04/04/2003	WID003967148
Range Bag House	Range Bag House		D008				X	X			10/29/2003	TXD074196338
Silver Paper	Various Sources		D009, D011				X				12/29/2003	WID988580056
Stop Off Debris	Waste Stop Off Wax Plating Shop		D006, D007, D008				X	X			10/29/2003	TXD074196338
Toner	Copier Maintenance		D001				X				08/13/2003	TXD074196338
Vacuum W/ Lead From Blast	Sandblast		D008				X				08/13/2003	TXD074196338



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**  
BUREAU OF LAND / FIELD OPERATIONS SECTION  
**RCRA INSPECTION REPORT**

X/R

**GENERAL FACILITY INFORMATION**

USEPA ID #:	IL5210021833	IEPA ID #:	1618130001
Facility Name:	Rock Island Arsenal	Phone #:	(309) 782 - 6035
Location	SMARI - PWN Bldg 102	County:	Rock Island
City:	Rock Island	State:	Illinois
		Zip Code:	61299 - 5000
Region:	Peoria	Inspection Date:	06/22/04 06/23/04
		Time:	9 AM to 2 PM 9 AM to 11 AM
Weather:	70 F, Sunny, Dry / 79 F, Sunny, Dry		

**TYPE OF FACILITY**

Notified As:	Generator/Storage	Regulated As:	Generator/Storage
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RECEIVED

AUG 02 2004

**TYPE OF INSPECTION**

CEI:	<input checked="" type="checkbox"/> CME/O&M:	<input type="checkbox"/> CSI:	<input type="checkbox"/> NRR:	<input type="checkbox"/> CCI:	<input type="checkbox"/> PIF:	<input type="checkbox"/> CVI:	<input type="checkbox"/> CSE:	<input type="checkbox"/> CAO:	<input type="checkbox"/>
FUI to:	Other:								

IEPA-DLPG

**NOTIFICATION INFORMATION (EPA 8700-12)**

Notification Date:	08/18/80 (Initial)	03/11/93 (subsequent)
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**PART A PERMIT INFORMATION (EPA 3510-3 OR EPA 8700-23)**

Part A Date:	11/19/80	Amended:	03/11/93	Withdrawn:
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**PART B PERMIT INFORMATION**

(Check one if applicable) Application Submitted?	<input checked="" type="checkbox"/> Permit Issued?	<input type="checkbox"/>	Date:
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**ACTIVE ENFORCEMENT**

Date facility referred to:	USEPA:	IAGO:	County State's Attorney:
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**ACTIVE ENFORCEMENT ORDERS**

CACO:	CAFO:	Federal Court Order:
Consent Decree:	IPCB Order:	State Court Order:

**RELEASABLE**

AUG 23 2004

**REVIEWER MD**

### TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	On Part B?	Activity ever done?	Closed?	Being done during inspection?	Exempt per 35 IAC Sec:	On Annual Report:		
							2002	2001	2000
SO1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SO2	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TO1	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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#### OWNER

#### OPERATOR

<b>Name:</b>	United States Army Rock Island Arsenal	<b>Name:</b>	Rock Island Arsenal
<b>Address:</b>	SMARI-PWN Bldg. 102	<b>Address:</b>	SMARI-PWN Bldg. 102
<b>City:</b>	Rock Island	<b>City:</b>	Rock Island
<b>State:</b>	IL	<b>State:</b>	IL
<b>Zip Code:</b>	61299-500	<b>Zip Code:</b>	61299-500
<b>Phone #:</b>	(309) 782 - 7907	<b>Phone #:</b>	(309) 782 - 7907

#### PERSON(S) INTERVIEWED

#### TITLE

#### PHONE #

Fran Wildman	Hazardous Waste Manager	(309) 782-7907
Merle Arensdorff	Engineering Technician	(309) 782-7907
Stephen Clark	Environmental Coordinator	(309) 782-7907

#### INSPECTION PARTICIPANTS

#### AGENCY/BUREAU

#### PHONE #

*Robert J. Wagner	IEPA / BOL	(309) 693 - 5462

\*Report prepared by this person.



# RCRA Generator Violations Checklist

IEPA #: 1618130001 Inspection Date: 06/22/04 & 06/23/04

Section	Area	V	C	R	Section	Area	V	C	R	Section	Area	V	C	R
725.291(a)	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
725.291(b)	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
725.293(a)	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
725.293(b)	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
725.294	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
725.295(a)	DTR	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			<input type="checkbox"/>	<input type="checkbox"/>						

# HAZARDOUS WASTE DISPOSITION FORM

Facility Name: Rock Island Arsenal						USEPA ID #: IL5210021833						
Inspection Date: 06/22/04 & 06/23/04						IEPA ID #: 1618130001						
Waste Name	Generating Process	Last Analysis Date	USEPA HW #	On Notif.? (8700-12)	On Part A? (3510-3 or 8700-23)	On Annual Report for Years:			Amount On-Site	Generation Rate (Pounds)	Last Manifest Date	Disposition
						03	02	01				
Emission Control Dust	Foundry pollution control		D006, D007, D008	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3 drums	03-982 02-8855 01-6175	12/29/03	Badger Disposal Of Wisconsin Inc., Milwaukee, Wisconsin, WID988580056
IWTF Solids	Sludge from plating wastewater pre-treatment		F006	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	3 drums	03-5463 02-4563 01-5122	05/03/04	Badger
Acrysol, Flammable Liquid	Base Operation		D001, D018,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-89	04/14/03	ONYX Environmental Services, Menomonee Falls, WID003967148
Adhesives	Contract Services		D001, D018	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-90	04/14/03	ONYX
Adhesives	Contract Services		D001 D035	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-259	04/03/03	Philip Reclamation Service, Houston Texas, TXD074196338
Aerosols	Contract Services		D001, D035, U226, U228	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2 Drums	03-63	04/03/03	Philip
Antifreeze w/ lead	Equipment maintenance		D008	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	0	03-1420 02-1080 01-950	03/22/04	Badger
Aqueous brake solution	Vehicle maintenance		D039	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0	03-410 02-399	05/04/04	Safety Kleen, Davenport, Iowa, IAD098027592



# HAZARDOUS WASTE DISPOSITION FORM

<b>Facility Name:</b> Rock Island Arsenal										<b>USEPA ID #:</b> IL5210021833		
<b>Inspection Date:</b> 06/22/04 & 06/23/04										<b>IEPA ID #:</b> 1618130001		
Asphalt Resin Cement	Pavement operations on base		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-550	04/14/03	ONYX
Capacitors, Non-PCB	CERCLA Landfill		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-20	04/14/03	ONYX
Cleaning Liquid, Ethanol, Acetic	Parts Washers		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-202	04/14/03	ONYX
Coal Tar Epoxy	Base operations		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-111	08/13/03	Phillip
Dead Level Asphalt	Pavement operations on base		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-446	05/22/03	ONYX
Developer	Copier maintenance		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-63	04/03/04	Phillip
Developer Prep	Copier maintenance		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-40	04/14/03	ONYX
Dispersant	Copier maintenance		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-30	04/14/03	ONYX
Mold Release	Foundry		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-245	05/22/03	Phillip
Fixer	Copier maintenance		D002, D005	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-180	04/14/03	ONYX
Floor Sweepings	Plating Shop		D006, D007, D008	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-339	05/22/03	Phillip
Hydrochloric Acid	CERCLA Landfill		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		03-140	09/10/03	Clean Harbors, Deer Park, Texas TXD055141378
Heat Treat Salts	Waste from heat treat skimmings		D007	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		03-440 02-2146 01-970	07/09/03	Phillip

Lead Solids and Powder	Lab		D008	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-50	04/14/03	ONYX
Lime, Sodium Nitrate, Hexachlorethane	Lab		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-560	10/29/03	Philip
Methanol	Landfill clean up		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-70	09/10/03	Clean Harbors
Sodium Hydroxide Cleaners	Lab		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-20	04/14/03	ONYX
Nitric Acid	Off-spec		D002	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-2944	04/03/03	Philip
Oil w/ TCEA	Marines		F001	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0	03-433 01-1318	04/03/03	Philip
Paint Cans	Various sources		D001 D035	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0	03-111 02-184	12/29/03	Badger
Paint Chips	Bridge Viaduct Sandblast		D008	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1 Drum	03-11753 02-302 01-99000	05/14/04	Envirite Of Illinois Harvey, Illinois ILD000666206
Paint with Flammable Solvent	Various sources		D001 D035	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-111	04/03/03	Philip
Paint with Solvent	Painting process		D001	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	4 Drums	03-21879 02-11,073 01-12480	05/03/04	Badger
Paint with Solvent	Painting process		D001, D007, D008	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0	03-1668 02-2069	04/14/03	ONYX
Paint Aerosol w/ Chromium	Various sources		D001, D007	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0	03-62 02-09	12/29/03	Badger
Petroleum Naphtha	Parts Cleaning Auto craft		D039	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	0	03-343 02-491 01-135	11/20/03	Safety Kleen
Plasticizer	Rubber Department		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0	03-315 02-18	6/13/03	Philip



Paint Related Material	Building 299 E		D002, D007	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-142	04/04/03	ONYX
Range Bag House	Range Bag House		D008	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		03-1048 02-268	10/29/03	Philip
Silver Paper	Various sources		D009, D011	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-20	12/29/04	Badger
Stop off Debris	Waste stop off wax plating shop		D006, D007, D008	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1 Drum	03-347 02-150	10/29/03	Philip
String Waste	Absorbent packing contaminated with petroleum naphtha		D001	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	0	03-1881 02-2102 01-3643	05/03/04	Badger
Sulfuric and Phosphoric Acid	Off-spec		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-372	02/18/03	Philip
Toner	Copier maintenance		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-15	08/13/03	Philip
Vacuum w/ Lead From Blast	Sandblast		D008	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	03-69	08/13/03	Philip
Silver Recovery Solution	Waste from Ag recovery from photocopying		D011	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	0	02-1150 01-560	01/20/04	Badger
Oil and Gas	Contract Services		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	01/20/04	Badger
Paint Chips	Contract Services		D008	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	03/22/04	Badger
Decon H2O	Contract Services		D008	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	03/22/04	Badger
Paint Chips	Commissary		D008	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	02/18/04	Clean Harbors

Gas and Water	Contract Services		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	03/25/04	Badger
Rust Proofing	Contract Services		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	03/25/04	Badger
Disinfectant	Contract Services		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	03/25/04	Badger
Charcoal Filters	Civil Defense		D007	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	03/25/04	Badger
Bleach, PW	Contract Services		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	03/25/04	Badger
Furfuryl Alcohol	Contract Services		D001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	07/18/02	Badger
Ferric Chloride	Various sources		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	05/10/04	US Liquids Of Detroit Incorporated Detroit, Michigan MID980991566
Ferric Chloride, Pallets	Various sources		D002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	05/10/04	US Liquids Of Detroit Incorporated Detroit, Michigan MID980991566



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## NARRATIVE

On June 22 [9 AM to 2 PM] and 16 [9 AM to 11 AM], 2004, a Compliance Evaluation Inspection was conducted in Rock Island County at LPC# 1618130001 and IL5210021833, Rock Island Arsenal. Robert Wagner (this author) of IEPA/DLPC/FOS - Peoria, conducted the inspection. The following Rock Island Arsenal personnel participated in the inspection: Frances Wildman (Hazardous Waste Manager) Stephen Clark (Environmental Coordinator), and Merle Arcnsdorff (Engineer Technician).

Rock Island Arsenal is an army installation under the command jurisdiction of the Commanding General Headquarters, U.S. Army Industrial Operations Command (IOC). The Arsenal has evolved over the years into a center of technical excellence for weaponry and related equipment. The current mission of the installation consists of the following:

5. Fabrication of major and secondary items for aircraft armament, infantry weapons, conventional artillery, and secondary armament of vehicles.
6. Engineering services for the tool and equipment material, including design and development of tools and equipment, acquisition, and testing.
7. Performance of depot-type functions relating to several programs.
8. Acquisition and assembly of Basic Issue Items.
9. Fabrication support to the pilot rebuild program, mobilization and industrial preparedness planning, processing of returned materials, and depot maintenance, technical, and logistical support for project managers, IOC, and other tenants.

The facility's processes include:

- a. Foundry - casting in iron, armor plate, brass, bronze, and aluminum.
- b. Forging.
- c. Machining - milling, drilling, turning, boring, and grinding.
- d. Metal joining and cutting - all types of welding and punch pressing.
- e. Assembly - general assembly and clean room assembly.
- f. Metal finishing - all types of plating, anodizing, phosphatizing, and painting.

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- g. Engineering support - large and small caliber firing range facilities and chemical labs.
- h. Printing - various manuals and reproduction.
- i. Administrative - data processing.

Hazardous wastes generated from the above processes are listed on the waste disposition sheets. Treatment and disposal facilities for the wastes are also listed on the waste disposition sheets. The facility generates several recurrent hazardous waste streams, as well as several one-time and production-dependent hazardous waste streams. The facility ships certain batteries and light bulbs of as universal waste.

The Arsenal filed the 8700-12 Notification as a generator of hazardous waste on August 18, 1980. The initial RCRA Part A was filed on November 19, 1980 and has been amended several times, the last having been submitted on March 11, 1993 as part of a revised RCRA Part B submittal.

The facility originally submitted the RCRA Part B application on October 18, 1988. In an Agency letter dated November 30, 1992, the RCRA Part B Permit was denied. The Arsenal resubmitted an amended application on March 11, 1993, and appealed the denial. On February 6, 1995, the Arsenal withdrew the appeal.

A closure plan (log C-737) for the hazardous waste management unit (Building 242) that was the focus of the Part B application was approved in an Agency letter dated August 4, 1994. Work on this closure plan was completed, and the closure certification was approved in an Agency letter dated August 2, 1995.

A closure plan (log C-600) for Building 64 unpermitted storage was originally approved August 7, 1992. The facility submitted a closure plan modification request on August 2, 1999, in a document entitled Plan for Sampling, Analysis, and Developing Remedial Objectives. This request was approved in an Agency letter dated December 28, 1999 (log C-600-M-5). The closure project activities were to be completed by July 1, 2000, and the closure certification document was to be submitted to the Agency by September 1, 2000. The facility submitted C-600-M-6 on March 27, 2000, but the Permit Section has not acted upon this modification. The modification details actions taken according to the above Plan and requests changes based on results of these activities. In addition, on December 21, 2000, the facility submitted technical information and a sampling plan in a document titled "Site Investigation Report, Soil Remediation Objectives Report, Contaminated Soil Remedial Action Plan, and Conceptual Groundwater Remedial Action Plan." When approved, the modification will contain an extension of the closure completion deadline.

The facility submitted permit modification C-600-M-2 on February 27, 2003. This permit modification is the Site Investigation Report and the Remediation Objective Report. The Permit Section is currently reviewing the Site documents.



### Facility Tour

The following areas of the facility were toured and observed:

Building 25 (Artillery Testing Range) - photographs 1, 2, 3, 4 and 5 show the satellite accumulation drums for the artillery test range air pollution equipment, generating D006/D007/D008 emission control dust. The ranges, when cleaned, also generate D008, range sand, or lead shot waste.

Building 159 (Garage) - this is a generation area for non-hazardous waste oil and antifreeze and D001, waste gasoline. Photograph 6 shows the satellite accumulation area. No hazardous waste was present in the satellite accumulation area at the time of the inspection.

Building 112 (MOP Shop) - photograph 7 shows the satellite accumulation area for solvent waste and waste oil. These waste are generated in this building by the teardown of equipment to write technical manuals. There was no waste in the satellite accumulation area at the time of the inspection.

Building 144 (Oil House) - this site, shown in photograph 8, houses satellite accumulation of waste batteries (D002/D003/D006/D009). The building is also a satellite accumulation area for D011, silver recovery solution.

Building 140 (Maintenance) - this building is used by an Arsenal contractor (Rock Island Integrated Services) for satellite accumulation of hazardous waste from work being conducted at several locations at the Arsenal. The wastes include oily string waste D001 (absorbent contaminated with petroleum naphtha), D002/D009 (waste batteries), universal waste fluorescent bulbs, and non-hazardous waste. The oily string waste is generated from the maintenance of the pivot mechanism on the Government Bridge. Photograph 9 shows the accumulation area. There was no waste in the accumulation area at the time of the inspection.

Building 299E (Care and Preservation) - this building contains a paint booth and is used for various sandblast, paint, and touch-up jobs. Photograph 10 shows the satellite accumulation area for paint waste (D001/F002/F005). There was no waste in the accumulation area at the time of the inspection.

Building 299W (Field Returns) - The western portion of 299 is used as a collection point for equipment returned from other bases. Hazardous waste is occasionally generated when the returned equipment contains materials that are determined to be unusable. Waste generated includes decon kits, adhesives, and small quantities of solvents. Photograph 11 shows the accumulation area. There was no waste in the accumulation area at the time of the inspection.

Building 247 (Navy - Marine Reserve Center) - this building generates several hazardous wastes including waste antifreeze (D008/D010), contaminated fuel (D001), batteries (D002), and non-hazardous oil contaminated with water from maintenance of vehicles. Photograph 12 shows a drum

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of used oil in the satellite accumulation area.

Building 242 - the former over-90-day storage building is now used as a less-than-90-day accumulation area. Photograph 13 shows the interior of 242 and the drums presently awaiting shipment. The following drums of hazardous waste were observed labeled and dated in the building; two drums of String Waste (D001, 06/02/04 & 06/16/04), three drums of Emission Control Dust (D006, D007, D008, 06/04/04), three drums of IWTF Solids (F006, 05/23/04, 05/25/04 & 06/10/04), four drums of Paint With Solvent (D001, 05/26/04, 05/29/04, 06/10/04 & 06/14/04), one drum of Paint Chips with Lead (D008, 06/16/04), one drum of Stop Off Debris (D006, D007, D008, 06/07/04), and two drums of Aerosol Lubricants and Adhesives (D001, U226, 06/16/04).

Building 222 (Heat Treat/Forge Shop) - photograph 14 shows satellite accumulation area for D001 (aerosol cans) generated by touch-up painting in this area. The heat treat shop occasionally generates D006/D007/D008 (heat treat salts), D001 (paint waste), and other hazardous waste. There was no waste in the satellite accumulation area at the time of the inspection.

Building 212P (Plating) - photograph 15 shows satellite accumulation of stop-off debris, floor sweepings, and lead anodes from the plating shop. The drum pictured in Photograph 15 contained lead anodes (D008).

Building 212W (Foundry) - photographs 16 and 17 show the foundry air pollution control equipment and satellite accumulation area for emission control dust (D006/D007/D008) from that equipment.

Building 208 (Production Paint Shop) - photograph 18 shows an accumulation area for waste paint. At the time of the inspection, there was no waste paint in this area. Photograph 19 shows a separate satellite accumulation area containing D001 in a different part of 208.

Building 210 (Material Science Lab) - the hazardous wastes accumulated in this building can include D008 (lab waste), waste batteries, and waste oil with TCEA (F001) generated in laboratory activities. This satellite accumulation area is shown in photograph 20 and contained F001 (oil contaminated with TCEA).

Building 349 (Self Help Auto Maintenance Shop) - this building is used by Arsenal personnel for automotive care. Wastes generated include D008 (antifreeze), D001 (petroleum naphtha from a parts washer), and waste oil. Photograph 21 shows the satellite accumulation of waste antifreeze outside in a lockable cargo container.

This concluded the day's inspection activities at the Arsenal. This author departed the site at 2 PM.

On June 23, 2004, this author returned to the facility to continue the inspection. The following Rock Island Arsenal personnel participated in the inspection: Frances Wildman and Stephen Clark. This author reviewed all of the manifests for the calendar year 2004 and manifests for 2003 and



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2002. The latest manifested shipments of major hazardous waste streams are listed on the waste disposition sheets. No manifest discrepancies were noted, and according to Ms. Wildman, none had occurred during the past year. The appropriate Land Disposal Restriction Notifications were available with each manifest. The author also reviewed and/or received copies of the 2003 and 2002 Annual Reports, 2004 and 2003 manifest listings, an inventory of the 90-day accumulation building contents (Building 242), training records and contingency plan.

Frances Wildman and Stephen Clark conducted a tour at Building 64 (former Plating Shop) - this building is the site of the on-going RCRA closure log C-600 discussed earlier. The building has been completely emptied, steam cleaned, and repainted. The current approved modification includes a plan for assessing contamination that had apparently migrated to soil around the building through various pathways. Photographs 1 and 2, show the interior of the building. The building is listed on the National Historic Registry. This author departed at 11 AM.

Following a review of Agency files and facility documents, the permit, generator, TSD, LDR, and universal waste checklists were completed. The facility currently operates as a generator, but is regulated as a storage facility until completion of closure for Building 64. The tanks located in Building 64 have been completely emptied, steam cleaned, and repainted in accordance with RCRA closure log C-600. This resolves the following tank violations; Section(s) 725.291(a), 725.291(b), 725.293(a), 725.293(b), 725.294 and 725.295(a) of the Regulations. However, Rock Island Arsenal still must complete closure activities in accordance with RCRA closure plan log C-600 and any Agency approved modification to the closure plan. No apparent violations were observed during this inspection.

Regulation	RCRA PERMIT INSPECTION CHECKLIST (PART 703)	Violation
	<b>PART 703: RCRA PERMIT PROGRAM</b> <b>SUBPART B: PROHIBITIONS</b> <b>Section 703.121 RCRA Permits</b> Has any person conducted any hazardous waste treatment, hazardous waste storage or hazardous waste disposal operation doing so only: 1) With a RCRA permit? Yes _____ No _____ N/A _____ 2) In conformance with all conditions imposed by a RCRA permit? Yes _____ No _____ N/A _____	Facility was actively Pursuing a Part B When Continuing Violations originally cited 703.121(a) 703.121(b)
703.121(a)	Does the owner and operator of HWM units have permits during the active life of the unit including closure and post-closure periods? Yes _____ No _____ N/A _____	703.121(a)
703.121(b)		703.121(b)
	<b>SUBPART C: AUTHORIZATION BY RULE AND INTERIM STATUS</b> <b>Section 703.150 Applications by Existing HWM Facilities and Interim Status Qualifications</b> Has the owner or operator of an existing HWM facility submitted a Part A permit application within the required time frame? Yes _____ No _____ N/A _____	703.150(a)
703.150(a)		703.150(a)
703.151(a)	<b>Section 703.151 Application by New HWM Facilities</b> Has the facility submitted Part A and Part B of the permit application 180 days before the physical construction of the facility has commenced? Yes _____ No _____ N/A _____ <b>Note:</b> This violation should be cited in a Notice of Violation (NOV) only after approval from headquarters.	703.151(a)
703.152(a)(1)	<b>Section 703.152 Amended Part A Application</b> Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency when: The facility identifies a new waste stream or when a new waste has been listed? Yes _____ No _____ N/A _____ The facility has a process change or a change in design capacity? Yes _____ No _____ N/A _____	703.152(a)(1)
703.152(a)(2)	As necessary to comply with the provisions of Section 703.155: Changes During Interim Status? Yes _____ No _____ N/A _____ <b>Note:</b> The owner or operator of a facility who fails to comply with the updating requirements of this Section does not receive interim status for the waste not filed on the Part A.	703.152(a)(2)
703.154(a)	<b>Section 703.154 Prohibitions During Interim Status</b> During interim status, has the facility: treated, stored or disposed of only those hazardous wastes specified in Part A of the permit application? Yes _____ No _____ N/A _____	703.154(a)
703.154(b)	only employed processes specified in Part A of the permit application? Yes _____ No _____ N/A _____	703.154(b)
703.154(c)	operated within the design capacity specified in Part A of the permit application? Yes _____ No _____ N/A _____	703.154(c)
703.155	<b>Section 703.155 Changes During Interim Status</b> Did the owner or operator submit an amended Part A permit application not later than 90 days prior to changes in operational control or ownership of the facility? Yes _____ No _____ N/A _____ <b>Note:</b> A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this Section.	703.155



Regulation	RCRA PERMIT INSPECTION CHECKLIST (PART 703)	Violation
703.301(a)(1)	<b>Section 703.301 General Information</b> <b>Note:</b> What is a Remedial Action Plan (RAP)? A RAP is a special form of RCRA permit that an owner or operator may obtain, instead of a permit issued under 35 Ill. Adm. Code 702 and this Part, to authorize the owner or operator to treat, store, or dispose of hazardous remediation waste (as defined in 35 Ill. Adm. Code 720.110) at a remediation waste management site. A RAP may only be issued for the area of contamination where the remediation wastes to be managed under the RAP originated, or areas in close proximity to the contaminated area, except as allowed in limited circumstances under Section 703.306.	
703.301(b)(1)	If the owner or operator treats, stores, or disposes of hazardous remediation wastes in a manner that requires a RCRA permit under 703.121, has the owner or operator obtained on of the following?  A) A RCRA permit according to Parts 702 and 703? Yes _____ No _____ N/A _____  B) A RAP according to Subpart H of Part 703? Yes _____ No _____ N/A _____	
	<b>Note:</b> What is a remediation waste management site? "Remediation waste management site" means a facility where an owner or operator is or will be treating, storing, or disposing of hazardous remediation wastes. A remediation waste management site is not a facility that is subject to corrective action under 35 Ill. Adm. Code 724.201, but a remediation waste management site is subject to corrective action requirements if the site is located in such a facility. If the site is a remediation waste management site, refer to subsection 724.101(j).	703.301(b)(1)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(a)	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(c)



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b>	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	<b>Section 722.134 Accumulation Time</b> Has the generator complied with the following requirements? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or	
	B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or	
	C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or	
	D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>	
(725.211)	Has the generator closed an accumulation area? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:  All waste is accumulated in USDOT approved containers</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p> <p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.211) (725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b> Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)				Violation
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(d))	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(f))	Does the plan include: - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
<b>Note:</b> If the facility has had a release, explain in detail.					



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	<b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input checked="" type="checkbox"/> No _____ N/A _____ During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
722.134(g)	<b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	<b>SUBPART D: RECORDKEEPING AND REPORTING</b>	
722.140(a)	<b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.141(a)
	<b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.142(a)(2)
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A _____	722.143
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A _____	722.150
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A _____	722.160
	COMMENTS:	722.170

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Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
	<b>PART 728: RCRA LAND DISPOSAL RESTRICTIONS</b>	
728.101	<b>Note:</b> This Part identifies 1) hazardous wastes that are restricted from land disposal and 2) those circumstances where otherwise prohibited wastes may continue to be land disposed. This Part applies to persons that generate or transport hazardous waste and to owners and operators of hazardous waste treatment, storage, and disposal facilities.	
728.101(c)	<b>Note:</b> Restricted wastes may continue to be land disposed as follows: 1) an extension has been granted to the effective date of a prohibition (728.105); 2) an exemption has been granted from a prohibition (728.106). 4) if the waste is hazardous only because it exhibits a characteristic, is treated by DEACT, or is a D003 reactive cyanide and meets any of the criteria below: i) the waste is managed in a treatment system that discharges to waters of the U.S. pursuant to a Part 309 permit (i.e. NPDES); ii) the waste is treated for purposes of the pretreatment requirements of Parts 307 and 310; or iii) the waste is managed in a zero discharge system engaged in CWA-equivalent treatment (728.137(a)); and iv) the waste no longer exhibits a characteristic at the point of land disposal.	
728.101(d)	<b>Note:</b> This Part does not affect the availability of a waiver under CERCLA Section 121(d)(4).	
728.101(e)	<b>Note:</b> The following hazardous wastes are not subject to any provision of this Part: 1) wastes generated by a CESQG (<100 Kg/month); 2) on-site disposal of waste pesticide by a farmer (722.170); 3) waste identified or listed as hazardous after 11/8/84 for which USEPA has not promulgated a land disposal prohibition or treatment standard; 4) de minimis losses of waste that exhibit a characteristic of hazardous waste to wastewaters; or 5) laboratory wastes mixed with other plant wastewaters as described in this subsection.	
728.101(f)	<b>Note:</b> Universal wastes are exempt from Sections 728.107 and 728.150.	
728.101(g)	<b>Note:</b> This Part is cumulative with the land disposal restrictions of Part 729.	
	<b>SUBPART A: GENERAL</b>	
	<b>Section 728.103 Dilution Prohibited as a Substitute for Treatment</b>	
	<b>Note:</b> A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No answer to any of the questions under Section 728.103 is a violation.	
728.103(a)	Has a person diluted a restricted waste or a treatment residual of a restricted waste as a substitute for adequate treatment? Yes _____ No <input checked="" type="checkbox"/> N/A _____	728.103(a)
728.103(b)	Has a person diluted a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (Part 309), that treats wastes in a CWA-equivalent treatment system, or that treats wastes for purposes of pretreatment requirements under Part 310, using a method other than DEACT or for D003 reactive cyanide wastewater or nonwastewater? Yes _____ No <input checked="" type="checkbox"/> N/A _____	728.103(b)
728.103(c)	Is combustion of any of the wastes identified in Section 728. Appendix K occurring without meeting one or more of the criteria under this Section upon generation or after treatment? Yes _____ No <input checked="" type="checkbox"/> N/A _____	728.103(c)
728.103(d)	Has a person added iron to lead-containing hazardous wastes in order to achieve LDR treatment standards for lead? Yes _____ No <input checked="" type="checkbox"/> N/A _____	728.103(d)
728.104	<b>Section 728.104 Treatment Surface Impoundment Exemption</b> Are wastes that are otherwise prohibited from land disposal under this Part being treated in a surface impoundment that meets all of the conditions of this Section? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.104



Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.107(a)(1)	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator determined if the waste has to be treated before it can be land disposed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	728.107(a)(1)
728.107(a)(2)	<b>Note:</b> If the generator is managing a characteristic hazardous waste, then the generator shall comply with the special requirements of Section 728.109.  If a generator determines that its waste does not meet the treatment standards, has a one-time written notice been sent with the initial shipment to each treatment or storage facility (and placed a copy of the notice in the generator's file) that includes the following information (Section 728.107(a)(2) Generator Paperwork Requirements):  1) USEPA hazardous waste manifest number of first shipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  2) The statement: "The waste is subject to the LDRs" Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  <b>Note:</b> The constituents of concern for F001 through F005 and F039 and underlying hazardous constituents in characteristic wastes are required on the notice unless all constituents will be treated and monitored.  3) The applicable wastewater/nonwastewater category and subdivisions made within a waste code based on waste-specific criteria? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>  4) Waste analysis data (when available)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  5) When treating hazardous debris with alternative treatment technologies, the contaminants subject to treatment and an indication that these contaminants are being treated to comply with Section 728.145? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>  <b>Note:</b> No further notification is necessary until such time that the waste or facility changes.	728.107(a)(2)
728.107(a)(3)	Has the generator of a restricted waste or contaminated soil that meets the applicable treatment standards sent a one-time written notice with the required certification statement (and placed a copy in the generator's file) to each TSDF receiving the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.107(a)(3)
728.107(a)(4)	<b>Note:</b> The notice must include the information specified in Section 728.107(a)(3).  Has the generator of an exempt hazardous waste or contaminated soil sent a one-time written notice per Section 728.107(a)(4) to each LDF receiving the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.107(a)(4)
728.107(a)(5)	Has the generator developed, followed, and filed on-site a written waste analysis plan in accordance with this subsection for managing and treating prohibited hazardous waste or contaminated soil in tanks, containers, or containment buildings regulated under Section 722.134? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.107(a)(5)
728.107(a)(6)	<b>Note:</b> The notification requirements of subsection 728.107(a)(3) apply to wastes shipped off-site pursuant to this subsection 728.107(a)(5).  Has the generator retained on-site all supporting data used to make the determination, based on either knowledge of the waste or waste analysis data, that the hazardous waste or contaminated soil is restricted? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	728.107(a)(6)

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.107(a)(7)	Has the generator managing prohibited waste that is excluded from the definition of hazardous or solid waste or which is exempt from Subtitle C regulation (Sections 721.102 through 721.106), prepared and kept on-site a one-time notice of these exclusions or exemptions and the disposition of the waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.107(a)(7)
728.107(a)(8)	Has the generator retained all copies of notices, certifications, waste analysis data, and other documentation produced pursuant to this Section for at least three years from the date such waste was last sent to on-site or off-site treatment, storage, or disposal? Yes <input checked="" type="checkbox"/> No _____ N/A _____	728.107(a)(8)
728.107(a)(9)	Has the generator managing lab packs using alternative treatment standards fulfilled the conditions of this subsection including the notice specified in Section 728. Table I: General Paperwork Requirements (column 728.107(a)(9))? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.107(a)(9)
728.107(a)(10)	Has the small quantity generator (>100 - <1000 Kg/month) with a tolling agreement pursuant to Section 722.120(c) retained on-site a copy of the notice and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.107(a)(10)
728.107(b)	Has the treatment facility tested its waste or contaminated soil according to the frequency specified in its waste analysis plan as required by Sections 724.113 or 725.113 and subsections (b)(1) and (b)(2) of this section? Yes <input checked="" type="checkbox"/> No _____ N/A _____	728.107(b)
728.107(b)(3)	Has the treatment facility sent a one-time written notice with the initial shipment to the land disposal facility and kept a copy at the treatment facility that includes the required information indicated in the Treatment Facility Paperwork Requirements Table? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.107(b)(3)
728.107(b)(4)	Has the treatment facility submitted a certification, as specified in subsection 728.107(b)(4), with the initial shipment of waste, contaminated soil, or treatment residue of a restricted waste to the land disposal facility and placed a copy in the treatment facility's on-site files? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  Note: There are specific certification requirements for: B) debris excluded from the definition of hazardous waste; C) organic constituents having treatment standards expressed as concentration levels; D) characteristic waste treated on-site to remove the characteristic and then sent off-site for treatment of underlying hazardous waste constituents; and E) characteristic waste that contain underlying hazardous constituents that are treated on-site to remove the hazardous characteristics and to treat underlying hazardous constituents.	728.107(b)(4)
728.107(b)(5)	For waste or treatment residue that will be further managed at a different TSDF, is the treatment facility that sends the waste complying with the notification and certification requirements applicable to generators under Section 728.107(a)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.107(b)(5)
728.107(b)(6)	Has the recycling facility that is making off-site shipments of recyclable materials used in a manner constituting disposal: 1) submitted to the Agency a notice and certification with each shipment in accordance with 728.107(b)(3) and (b)(4)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) kept records of the name and location of each entity receiving the hazardous waste-derived product? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.107(b)(6)
728.107(c)	Has owner or operator of any land disposal facility disposing any waste subject to restrictions under this Part: 1) maintained in its files copies of the notices and certifications specified in Sections 728.107(a) and (b)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) tested the waste or an extract of the waste or treatment residue according to the frequency specified in the facility's waste analysis plan (Section 724.113 or 725.113) to assure the waste or treatment residue meets the applicable treatment standards? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.107(c)



Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.107(d)	<p><b>Note:</b> If an owner or operator is disposing of any waste that is a recyclable material used in a manner constituting disposal subject to the provisions of Section 726.120(b), they are not subject to subsections 728.107(c)(1) through (c)(3).</p> <p>Has the generator or treater who first claims that their hazardous debris is excluded from the definition of a hazardous waste under Section 721.103(c) provided the following notification and certification:</p> <p>1) a one-time notification submitted to the Agency including the following information:</p> <p>A) the name and address of the RCRA Subtitle D facility receiving the treated debris?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>B) a description of the hazardous debris as initially generated including the applicable USEPA hazardous waste code(s)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) for debris excluded under Section 721.103(e)(1), the technology from Section 728.Table F used to treat the debris?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) Has the notification been updated if the debris is shipped to a different facility, and, for debris excluded under Section 721.102(c)(1) if a different type of debris is treated, or if a different technology is used to treat the debris?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) For debris excluded under Section 721.103(e)(1), has the owner or operator of the treatment facility documented and certified compliance with the treatment standards of Section 728.Table F pursuant to this subsection?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	728.107(d)
728.107(c)	<p>Has the generator or treater that first receives a determination from USEPA or the Agency that a given contaminated soil subject to LDRs (Section 728.149(a)) no longer contains a listed hazardous waste or exhibits a characteristic of hazardous waste:</p> <p>1) prepared a one-time only documentation of these determinations including all supporting information?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) maintained that information in the facility files and other records for a minimum of three years?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	728.107(e)
728.109(a)	<p><b>Section 728.109 Special Rules for Characteristic Wastes</b></p> <p>Has the initial generator of a solid waste determined each hazardous waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D of Part 728?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p><b>Note:</b> For purposes of this Part, the waste must carry the waste code for any applicable listing under Part 721, Subpart D and one or more of the waste codes under Part 721, Subpart C where the waste exhibits the relevant characteristic, except in the case when the treatment standard for the Subpart D waste code operates in lieu of the standard for the Subpart C waste code as specified in subsection (b).</p> <p>If the generator determines that its waste displays a characteristic of hazardous waste (and the waste is not D001 nonwastewaters treated by CMBST, RORGS, or POLYM of Section 728.Table C), has the generator determined the underlying hazardous constituents (as defined at Section 728.102) in the characteristic waste?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	728.109(a)
(728.109(b))	<p><b>Note:</b> Where a prohibited waste is both listed and characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic waste code, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic. Otherwise, the waste must meet the treatment standards for all applicable listed and characteristic waste codes.</p>	

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.109(c)	Has the generator land disposed any prohibited waste that exhibits a characteristic under Part 721, Subpart C only if the waste complies with the treatment standards under Part 728, Subpart D (in addition to any applicable standards determined from the initial point of generation)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	728.109(c)
728.109(d)	Has the generator of a waste that no longer exhibits a characteristic placed a one-time notification and certification in the generator's or treater's files and sent a copy to the Agency (except for those facilities described in Section 728.109(f))? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.109(d)
	Has the notification and certification been updated to reflect process or operational changes in waste generation or RCRA Subtitle D receiving facility changes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Has the generator or treater notified the Agency annually (by December 31) of any such changes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
728.109(d)(1)	Does the notification include: A) the name and address of the RCRA Subtitle D (municipal solid waste landfill) facility receiving the waste shipment; and B) a description of the waste as initially generated, including the applicable USEPA hazardous waste codes, the treatability group(s), and the underlying hazardous constituents (Section 728.102), unless the waste will be treated and monitored for all underlying hazardous constituents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.109(d)(1)
	<b>Note:</b> If all underlying hazardous constituents will be treated and monitored, there is no requirement to list any of the underlying hazardous constituents on the notice.	
728.109(d)(2)	Is the certification signed by an authorized representative and does the certification state the language found in either: Section 728.107(b)(4)? or Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If treatment removes the characteristics but does not meet standards applicable to underlying hazardous constituents, Section 728.107(b)(4)(D)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.109(d)(2)
728.109(d)(3)	For a characteristic waste whose ultimate disposal will be into a Class I injection well, has the generator complied with this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.109(d)(3)
728.109(e)	For a decharacterized waste managed on-site in a wastewater treatment system subject to Clean Water Act (CWA) or zero-dischargers engaged in CWA-equivalent treatment, has the generator monitored compliance with the treatment standards (Sections 728.148 and 728. Table D) quarterly (unless the treatment is aggressive biological treatment, in which case compliance must be monitored annually)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Are monitoring results kept in on-site files for at least 5 years? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.109(e)
728.109(f)	For a decharacterized waste managed on-site in a wastewater treatment system subject to CWA for which all underlying hazardous constituents are addressed by a CWA permit, has the generator kept compliance documentation in on-site files? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.109(f)
728.109(g)	For a characteristic waste whose ultimate disposal will be into a Class I injection well that qualifies for the de minimus exclusion described in Section 728.101, has the generator kept information supporting that qualification in on-site files? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	728.109(g)



Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
	<b>SUBPART C: PROHIBITION OF LAND DISPOSAL</b>	
728.130	<b>Section 728.130 Waste Specific Prohibitions - Wood Preserving Wastes</b> Has the generator of wood preserving wastes, soil, debris, and radioactive wastes soil and debris (F032, F034, or F035) land disposed the wastes only after having: <div>             1) met the treatability standards of Part 728, Subpart D; or              2) been granted an exemption from prohibition pursuant to a petition under Section 728.106;              3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or              4) been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.5(See Section 728.105)?           </div> Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
728.130(e)	Has the generator of wood preserving wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.130
728.131	<b>Section 728.131 Waste Specific Prohibitions - Dioxin-Containing Wastes</b> Has the generator of a dioxin-containing waste, soil and debris (F020, F021, F022, F023, F026, F027 or F028) land disposed the waste only after having: <div>             1) met the treatability standards of Part 728, Subpart D; or              2) been granted an exemption from prohibition pursuant to a petition under Section 728.106; or              3) been granted an extension to the effective date of prohibition pursuant to Section 728.105?           </div> Yes _____ No _____ N/A _____	728.130(e)
728.132	<b>Section 728.132 Waste Specific Prohibitions - Soils Exhibiting the Toxicity Characteristic for Metals and Containing PCBs</b> Has the generator of any volumes of soil exhibiting the toxicity characteristic solely because of the presence of metals (D004 through D011) and containing PCBs, land disposed the waste only after having: <div>             1) met the treatability standards of Part 728, Subpart D and the wastes contain halogenated organic compounds in total concentration less than 1,000 mg/kg; or              2) met the alternative treatment standards specified in Section 728.149 for contaminated soil and the wastes contain halogenated organic compounds in total concentration less than 1,000 mg/kg; or              3) been granted an exemption from prohibition pursuant to a petition under Section 728.106; or              4) met the applicable treatment standards established pursuant to a petition granted under Section 728.144?           </div> Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.131
728.133	<b>Section 728.133 Waste Specific Prohibitions - Chlorinated Aliphatic Wastes</b> Has the generator of K174 and K175 hazardous wastes, soil and debris contaminated with these wastes, radioactive wastes mixed with these wastes, and soil and debris contaminated with radioactive wastes mixed with these wastes land disposed the waste only after having: <div>             1) met the treatability standards of Part 728, Subpart D; or              2) been granted an exemption from prohibition pursuant to a petition under Section 728.106;              3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or              4) hazardous debris meet the treatment standards in Section 728.140 or the alternative treatment standards in Section 728.145; or              5) been granted an extension to the effective date of prohibition pursuant to Section 728.105?           </div> Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.132
728.133(c)	Has the generator of chlorinated aliphatic wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.133
		728.133(c)

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.133(d)	Have the K175 hazardous wastes that have been disposed in compliance with all applicable Section 728.140 treatment standards been macroencapsulated in accordance with Part 728, Table F unless the waste is placed in: 1) A RCRA Subtitle C monofill containing only K175 wastes that meet all applicable Section 728.140 treatment standards; or 2) A dedicated RCRA Subtitle C landfill cell in which all other wastes being co-disposed are at pH 6.0? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.133(d)
728.134	<b>Section 728.134 Waste Specific Prohibitions - Toxicity Characteristic Metal Waste</b> <b>Note:</b> Toxicity Characteristic metal waste include, waste soils or debris carrying the D004 through D011 codes and slag from secondary lead smelters. Effective May 26, 2000 Toxicity Characteristic metal waste will include waste from elemental phosphorus processing and radioactive waste mixed with D004 - D011. Has the generator of toxicity characteristic metal waste, soil and debris land disposed the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or 2) been granted an exemption from prohibition pursuant to a petition under Section 728.106; 3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or 4) been granted an extension to the effective date of prohibition pursuant to Section 40 CFR 268.5? Yes <input checked="" type="checkbox"/> No _____ N/A _____	728.134
728.134(f)	Has the generator of toxicity characteristic metal waste tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes <input checked="" type="checkbox"/> No _____ N/A _____	728.134(f)
728.135	<b>Section 728.135 Waste Specific Prohibitions - Petroleum Refining Wastes</b> Has the generator of petroleum refining wastes soil, debris, and radioactive wastes soil and debris (K169, K170, K171, and K172) land disposed of the waste only after having: 1) met the treatability standards of Part 728, Subpart D; or 2) been granted an exemption from prohibition pursuant to a petition under Section 728.106; 3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; 4) met the treatment standard in Section 728.140 and Table T for hazardous debris, or in the alternative, treatment standards in Section 728.145; or 5) been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.5? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.135
728.135(c)	Has the generator of petroleum refining wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.135(c)
728.137(a)	<b>Section 728.137 Waste Specific Prohibitions - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated</b> Has the generator of D001 (not in the High TOC Ignitable Liquids Subcategory) or D002 waste refrained from land disposal of these wastes in means other than Clean Water Act regulated discharges, Class I deep well injection or zero discharges that engage in CWA-equivalent treatment before ultimate land disposal? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.137(a)
728.137(b)	Has the generator refrained from land disposal of any D001 (not in the High TOC Ignitable Liquid Subcategory) or D002 wastes managed in Class V injection wells that do not engage in CWA-equivalent treatment before injection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.137(b)



Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.138(a)	<p><b>Section 728.138 Waste Specific Prohibitions - Newly Identified Organic Toxicity Characteristic Wastes and Newly-Listed Coke By-Product and Chlorotoluene Production Wastes</b></p> <p>Has the owner or operator land disposed any of the following wastes:</p> <ul style="list-style-type: none"> <li>- K141, K142, K143, K144, K145, K147, K148, K149, K150 or K151;</li> <li>- Debris contaminated with F037, F038, K107 through K112, K117, K118, K123 through K126, K131, K132, K136, U328, U353, U359;</li> <li>- Soil and debris contaminated with D012 through D043, K141 through K145, or K147 through K151; or</li> <li>- D012 through D043 that are not radioactive, that are managed in systems other than those whose discharge is regulated under the CWA, that are zero dischargers that do not engage in CWA-equivalent treatment before ultimate disposal, or that are injected in Class I DEEP wells only after having:               <ol style="list-style-type: none"> <li>1) met the treatability standards of Part 728, Subpart D; or</li> <li>2) been granted an exemption from prohibition pursuant to a petition under Section 728.106;</li> <li>3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or</li> <li>4) been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.52</li> </ol> </li> </ul> <p style="text-align: right;">Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	728.138(a)
728.138(c)	<p>Has the generator of the above wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards?</p> <p style="text-align: right;">Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	728.138(c)
728.139	<p><b>Section 728.139 Waste Specific Prohibitions - End-of-Pipe CWA, CWA-Equivalent, and Class I Nonhazardous Waste Injection Well Treatment Standards; Spent Aluminum Potliners; and Carbamate Wastes.</b></p> <p>Has the owner or operator land disposed any of the following wastes:</p> <ol style="list-style-type: none"> <li>1) Hazardous soil and debris with the hazardous waste numbers K156 through K159, K161, P127, P128, P185, P188 through P192, P194, P196 through P199, P201 through P205, U271, U278 through U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, and U409 through U411;</li> <li>2) D003 other than those that are managed in a system whose discharge is regulated under Subtitle C, one that injects hazardous waste in a Class I injection well, or one that is a zero discharger that engages in federal CWA-equivalent treatment before ultimate land disposal;</li> <li>3) Waste, soil and debris with the hazardous waste number K088; and</li> <li>4) Radioactive waste, soil and debris with the hazardous waste numbers K088, K156 through K159, K161, P127, P128, P185, P188 through P192, P194, P196 through P199, P201 through P205, U271, U278 through U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, and U409 through U41 only after having:               <ol style="list-style-type: none"> <li>1) met the treatability standards of Part 728, Subpart D; or</li> <li>2) been granted an exemption from prohibition pursuant to a petition under Section 728.106;</li> <li>3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or</li> <li>4) been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.5?</li> </ol> </li> </ol> <p style="text-align: right;">Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	728.139
728.139(g)	<p>Has the generator of the above wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards?</p> <p style="text-align: right;">Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	728.139(g)
	<p><b>SUBPART E: PROHIBITIONS ON STORAGE</b></p> <p><b>Note:</b> Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C is prohibited.</p>	

728.150(a)(1)	<b>Section 728.150 Prohibitions on Storage of Restricted Wastes</b> Has the generator stored restricted wastes in tanks, containers, or containment buildings on-site solely for the accumulation of such quantities as necessary to facilitate proper recovery, treatment or disposal? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator complied with the requirements of Section 722.134? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.150(a)(1)
728.150(a)(2)	<b>Note:</b> A generator in existence on the effective date of regulation under this Part and who must store hazardous wastes for more than 90 days due to regulations under this Part becomes a TSD and must obtain a RCRA permit.  Has the owner/operator of a TSD stored restricted wastes in tanks, containers, or containment buildings solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  If yes, has the owner/operator: A) clearly marked each container to identify its contents and the accumulation start date? Yes _____ No _____ N/A <input checked="" type="checkbox"/> B) clearly marked each tank to identify its contents, recorded the quantity of each hazardous waste received and indicated the accumulation start date, all in accordance with the operating record requirements of 724.173 or 725.173? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.150(a)(2)
728.150(a)(3)	Has the transporter stored manifested shipments of such wastes at a transfer facility for 10 days or less? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.150(a)(3)
728.150(b)	Has the owner/operator of a TSD stored restricted wastes up to one year solely for accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.150(b)
728.150(c)	Has the owner/operator of a TSD who has stored such wastes beyond one year proved that such storage was solely for the accumulation of such quantities of hazardous waste to facilitate proper recovery, treatment or disposal? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  <b>Note:</b> If a generator's waste is exempt from a prohibition on the type of land disposal utilized for the waste (e.g. case-by-case extension, incorporated by reference or an approved petition) the prohibition in subsection (a) does not apply during the period of such exemption.  <b>Note:</b> The prohibition in subsection (a) does not apply to hazardous wastes that meet the treatment standards (728.141, 728.142 and 728.143) or the adjusted treatment standards (728.144) or, where treatment standards have not been specified, the waste is in compliance with the applicable prohibitions specified in Section 728.139.	728.150(c)
728.150(f)	Have liquid hazardous wastes containing PCBs at concentrations greater than 50 ppm been stored at a facility that meets the requirements of 40 CFR 261.65(b) and have they been removed from storage and treated or disposed as required by this Part within one year of the date when such wastes were first placed into storage? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	728.150(f)
728.150(g)	<b>Note:</b> The prohibition and requirements in this Section do not apply to hazardous remediation wastes stored in a staging pile approved pursuant to Section 724.654.	

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Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	<b>PART 733: STANDARDS FOR UNIVERSAL WASTE MANAGEMENT</b>	
	<b>SUBPART A: GENERAL</b>	
	<b>Section 733.101 Scope</b>	
733.101	<b>Note:</b> This Part provides an alternative set of management standards for batteries (Section 733.102), pesticides (Section 733.103), thermostats (Section 733.104), and lamps (Section 733.105), in lieu of regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	
	<b>Note:</b> Pursuant to Section 733.105, persons managing household hazardous wastes, exempt under subsection 724.104(b)(1), or conditionally exempt small quantity generator wastes, exempt under Section 721.105(g), and are of the same type as universal wastes defined in Section 733.106, may, at their option, manage them under the requirements of this Part.	
	<b>Section 733.102 Applicability – Batteries</b>	
733.102	<b>Note:</b> Spent lead-acid batteries that are managed under Part 726, Subpart G, are not covered under this Part. Generators of batteries as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
	<b>Section 733.103 Applicability – Pesticides</b>	
733.103	<b>Note:</b> Pesticides covered under this Part include: 1) recalled stocks of a suspended and canceled pesticide as part of a voluntary or mandatory recall under Section 19(b) of FIFRA; or 2) recalled stocks of a suspended and canceled pesticide as part of a voluntary recall by the registrant for a pesticide not in compliance with FIFRA; or 3) stocks of other unused pesticide products that are collected and managed as part of a waste pesticide collection program.  Pesticides not covered under this Part include recalled or unused pesticides that are managed by farmers in compliance with Section 722.170.	
	<b>Section 733.104 Applicability – Mercury Thermostats</b>	
733.104	<b>Note:</b> Generators of mercury thermostats as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
	<b>Section 733.105 Applicability – Lamps</b>	
733.105	<b>Note:</b> Generators of lamps as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
	<b>SUBPART B: STANDARDS FOR SMALL QUANTITY GENERATORS</b>	
	<b>Section 733.111 Prohibitions</b>	
733.111(a)	Has the small quantity handler refrained from disposing of universal waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.111(a)
733.111(b)	Has the small quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.117) or managing specific wastes (Section 733.113)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.111(b)
	<b>Section 733.112 Notification</b>	
733.112	<b>Note:</b> A small quantity handler of universal waste means a universal waste handler that does not accumulate 5,000 kilograms or more of universal waste at any time. A small quantity handler of universal waste is not required to notify the Agency of its universal waste handling activities.	
	<b>Section 733.113 Waste Management</b>	
733.113(a)(1)	Has the small quantity handler contained any universal waste battery that shows evidence of leakage, spillage, or damage in a proper container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.113(a)(1)
733.113(a)(2)	Has each battery cell remained intact and closed while the small quantity handler conducted the activities listed in subsection 733.113(a)(2) (except to remove electrolyte; but must be immediately closed after removal)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.113(a)(2)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
733.113(a)(3)	<p>Has the small quantity handler that removes electrolyte from batteries or that generates other solid waste as a result of the activities listed in subsection 733.113(a)(2) made a proper hazardous waste determination?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the electrolyte or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.</p>	733.113(a)(3)
733.113(b)	<p>Has the universal waste pesticide(s) been contained in a closed container, an over packed container, a tank meeting the requirements of Part 725, Subpart J (except for 725.297(c) and 725.300), or a transport vehicle or vessel in a way that prevents releases to the environment?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	733.113(b)
733.113(c)(1)	<p>Has the small quantity handler contained any universal waste mercury thermostat that shows evidence of leakage, spillage, or damage in a proper container?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	733.113(c)(1)
733.113(c)(2)	<p>Has the small quantity handler followed each of the procedures identified in subsection 733.113(c)(2) when removing mercury-containing ampules from universal waste thermostats?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	733.113(c)(2)
733.113(c)(3)	<p>Has the small quantity handler that removes mercury-containing ampules from universal waste thermostats or that generates other solid waste as a result of the removal of the ampules made a proper hazardous waste determination for mercury or clean-up residues resulting from spills or leaks or other solid waste generated?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the mercury, residues, or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.</p>	733.113(c)(3)
733.113(d)	<p>Has the small quantity handler of lamps managed them in a manner that prevents releases to the environment as follows:</p>	
733.113(d)(1)	<p>Contained all lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps, and kept such containers and packages closed with no evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	733.113(d)(1)
733.113(d)(2)	<p>Immediately cleaned up and contained any lamp that is broken and placed in a container any lamp that shows evidence of breakage, leakage, or damage that could cause a release of hazardous constituents.</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	733.113(d)(2)
733.113(d)(3)	<p>treated (by crushing) those lamps only under the following conditions:</p> <p>A) in a closed system where emission of mercury does not exceed 0.1 mg/m<sup>3</sup> on the basis of time weighted average over an 8-hour period?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>B) submitted Agency notification of crushing activity quarterly?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>D) ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levels?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>E) ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>F) crushed lamps are stored in closed non-leaking containers that are in good condition?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	733.113(d)(3)



Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
733.114(a)	<b>Section 733.114 Labeling and Marking</b> Does the small quantity handler of universal waste batteries label or mark each battery or container of batteries with one of the following: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.114(a)
733.114(b)	Does the small quantity handler of <u>recalled</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the label that was on or accompanied the product and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.114(b)
733.114(c)	Does the small quantity handler of <u>unused</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the original product label (if still legible) or, if not legible, the appropriate USDOT label or, if not feasible, another label prescribed or designated by the collection program; and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.114(c)
733.114(d)	Does the small quantity handler of universal waste thermostats label or mark each thermostat or container of thermostats with one of the following: "Universal Waste-Mercury Thermostat(s)", "Waste Mercury Thermostat(s)", or "Used Mercury Thermostat(s)"? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.114(d)
733.114(e)	Does the small quantity handler of universal waste lamps label or mark each lamp or container of lamps with one of the following: "Universal Waste-lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.114(e)
733.115(a)	<b>Section 733.115 Accumulation Time Limits</b> Does a small quantity handler of universal waste accumulate the waste for no longer than one year from the date it was generated or received unless the requirements of subsection 733.115(b) are met? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.115(a)
733.115(b)	A small quantity handler of universal waste may accumulate universal waste for longer than one year from the date of generation or receipt if such activity is done solely to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proof for such activity. Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.115(b)
733.115(c)	Does the small quantity handler of universal waste demonstrate the length of accumulation time from the date it becomes a waste or is received in accordance with this subsection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.115(c)
733.116	<b>Section 733.116 Employee Training</b> Has the small quantity handler of universal waste informed all employees handling or managing universal waste of proper and appropriate handling and emergency procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.116
733.117(a)	<b>Section 733.117 Response to Releases</b> Has the small quantity handler of universal waste immediately contained all releases and residues? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.117(a)
733.117(b)	Has the small quantity handler of universal waste made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.117(b)
733.118(a)	<b>Section 733.118 Off-Site Shipments</b> Does the small quantity handler of universal waste only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.118(a)
733.118(b)	If a small quantity handler of universal waste self-transportes universal waste off-site, is it done so only in compliance with the transporter requirements of Subpart D (Part 733)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.118(b)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
733.118(c)	Has the small quantity universal waste handler only offered universal waste (that is a USDOT hazardous material under 49 CFR 171 through 180) for off-site transportation in accordance with applicable USDOT regulations (49 CFR 172 through 180)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.118(c)
733.118(d)	Does the originating small quantity universal waste handler ensure, prior to shipment, that the receiving handler agrees to receive the shipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.118(d)
733.118(e)	Does the small quantity handler of universal waste whose shipment of universal waste is rejected by the receiving handler or destination facility either received the waste back or agreed on an alternate destination facility to which the shipment will be sent? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.118(e)
733.118(f)	If the small quantity handler of universal waste has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the shipment to an agreed upon destination facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.118(f)
733.118(g)	If the small quantity handler of universal waste has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for managing the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.118(g)
733.118(h)	If the small quantity handler of universal waste receives a shipment of non-hazardous, non-universal waste, has the handler managed the waste in compliance with applicable solid waste regulation? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	733.118(h)
733.119	<b>Section 733.119 Tracking Universal Waste Shipments</b> <b>Note:</b> A small quantity handler of universal waste is not required to keep records of shipments of universal waste.	
733.120	<b>Section 733.120 Exports</b> Has the small quantity handler of universal waste complied with this section for all exports of universal waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.120
<b>SUBPART C: STANDARDS FOR LARGE QUANTITY HANDLERS</b>		
733.131(a)	<del><b>Section 733.131 Prohibitions</b> Has the large quantity handler refrained from disposing of universal waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></del>	<del>733.131(a)</del>
733.131(b)	<del>Has the large quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.137) or managing specific wastes (Section 733.133)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></del>	<del>733.131(b)</del>
733.132(a)	<del><b>Section 733.132 Notification</b> Has the large quantity handler of universal waste sent a written notification of universal waste management to the Agency and received a USEPA Identification Number before meeting or exceeding the 5000 kilogram storage limit? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  <b>Note:</b> A large quantity handler that has already notified the USEPA or Agency of its hazardous waste management activities and received a USEPA Identification Number is not required to renotify.  <b>Note:</b> A large quantity handler of recalled universal waste pesticides that has sent notification to USEPA or the Agency, as required by 40 CFR 165, is not required to renotify.</del>	<del>733.132(a)</del>
733.132(b)	<del>Does the notification submitted by the large quantity handler of universal waste include the information listed under subsections 733.132(b)(1) through (b)(5)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></del>	<del>733.132(b)</del>



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<b>PART 725: INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>SUBPART A: GENERAL PROVISIONS</b> <b>Section 725.101 Purpose, Scope and Applicability</b> Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <input checked="" type="checkbox"/> N/A _____ <b>Note:</b> If "Yes", explain in the narrative.	
725.101(c)		
725.101(d)	Has the facility managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of Section 725.101(d)(1) through (5)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.101(d)
	<b>SUBPART B: GENERAL FACILITY STANDARDS</b> <b>Section 725.111 USEPA Identification Number</b> Has the facility obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No _____ N/A _____	725.111
725.112(a)	<b>Section 725.112 Required Notices</b> Has the owner/operator of the facility provided the required notices: a) upon receiving hazardous waste from a foreign source? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.112(a)
725.112(b)	b) prior to transferring ownership/operational control of the facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.112(b)
725.113(a)	<b>Section 725.113 General Waste Analysis</b> Has the owner/operator obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the analysis contain all the necessary information to treat, store or dispose of the waste in accordance with Parts 725 and Part 728? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the analysis been repeated: - when the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - for off-site facilities, when the results of an on-site inspection indicate that the hazardous waste received at the facility does not match the accompanying manifest or shipping paper? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the owner/operator of an off-site facility inspected each hazardous waste shipment received at the facility to ensure that it matches the waste identified on the accompanying manifest or shipping paper? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.113(a)
725.113(b)	Has the owner/operator developed a written waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan available at the facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the owner/operator follow the procedures specified in the plan so as to comply with Section 725.113(a)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan specify: 1) the parameters for which each hazardous waste will be analyzed and the rationale for selecting these parameters? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 2) the test methods which will be used to test for these parameters? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 3) the sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.113(b)

BLD. 64 Closure remains to be Completed. Facility operating as a generator

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<p>4) the frequency with which the initial analysis of the waste will be reviewed or repeated to ensure accurate and up-to-date analysis?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>5) for off-site facilities, the waste analyses that hazardous waste generators supply?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>6) the methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> <li>- 725.300 (Tanks)?</li> <li>- 725.325 (Surface Impoundments)?</li> <li>- 725.352 (Waste Piles)?</li> <li>- 725.373 (Land Treatment)?</li> <li>- 725.414 (Landfills)?</li> <li>- 725.441 (Incinerators)?</li> <li>- 725.475 (Thermal Treatment)?</li> <li>- 725.502 (Chemical, Physical and Biological Treatment)?</li> <li>- 725.934(d) (Air Emissions - Process Vents)?</li> <li>- 725.963(d) (Air Emissions - Equipment Leaks)?</li> <li>- 725.984 (Air Emissions - Subpart CC)?</li> <li>- 728.107 (Land Disposal Restrictions)?</li> </ul> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> Circle appropriate Section.</p> <p>7) for surface impoundments exempted from land disposal restrictions (LDR) under Section 728.104(a), the procedures and schedules for:</p> <ul style="list-style-type: none"> <li>- the sampling of impoundment contents</li> <li>- the analysis of test data; and</li> <li>- the annual removal of residues as specified in this Section?</li> </ul> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>8) for owners and operators seeking an exemption to the air emission standards of 724.Subpart CC in accordance with Section 725.983:</p> <ul style="list-style-type: none"> <li>- if direct measurement is used for the waste determination are schedules and procedures for waste sampling and analysis of test data to verify exemption being maintained?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> <li>- if knowledge of the waste is being used to make this determination, is the documentation being maintained?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></li> </ul>	
725.113(c)	<p>For off-site facilities, does the plan:</p> <p>1) describe the procedures which will be used to determine the identity of each movement of waste managed at the facility?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) describe the sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) describe the procedures that will be used to determine whether a hazardous waste generator or treater has added a biodegradable sorbent to the waste in the container?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.113(c)
725.114(a)(b)	<p><b>Section 725.114 Security</b></p> <p>Does the facility qualify for the exemption to the requirement to provide security specified in Section 725.114(a)?  Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Does a non-exempt facility have either :</p> <ul style="list-style-type: none"> <li>- a 24-hour surveillance system?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> <li>or</li> <li>- an artificial or natural barrier which completely surrounds the active portion of the facility; and  Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> <li>- gates or other entrances to the active portion of the facility  Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> </ul>	725.114(a)(b)
725.114(c)	<p>Does a non-exempt facility have a sign with the words "Danger- Unauthorized Personnel Keep Out" posted at each entrance to the active portion of the facility?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<p><b>Note:</b> Existing signs with legends other than the one above may be used if the legend indicates that access is restricted to authorized personnel only and that entry onto the active portion can be dangerous.</p> <p><b>Section 725.115 General Inspection Requirements</b></p> <p>725.115(a) Does the owner/operator inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or may lead to a release of hazardous waste constituents to the environment or a threat to human health or the environment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.114(c)
	<p>Does the owner/operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.115(a)
725.115(h)	<p>Has the owner/operator developed and followed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the written schedule kept at the facility?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the schedule identify the types of problems which are to be looked for during the inspection?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the schedule specify at least the following minimum inspection frequency:</p> <ul style="list-style-type: none"> <li>- daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- the items and frequencies, where applicable, called for in Sections:</li> <li>- <del>725.274 (Containers)</del></li> <li>- 725.293 (Tanks)</li> <li>- 725.295 (Tanks)</li> <li>- 725.326 (Surface Impoundments)</li> <li>- 725.447 (Incinerators)</li> <li>- 725.477 (Thermal Treatment)</li> <li>- 725.503 (Chemical, Physical and Biological Treatment)</li> <li>- 725.933 (Air Emissions - Process Vents)</li> <li>- 725.952 (Air Emissions - Equipment Leaks)</li> <li>- 725.953 (Air Emissions - Equipment Leaks)</li> <li>- 725.958 (Air Emissions - Equipment Leaks)</li> <li>- <del>725.984 through 725.990 (Air Emissions - Subpart C.C)</del></li> </ul> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.115(b)
725.115(c)	<p><b>Note:</b> Circle the applicable Section(s).</p> <p>Has the owner/operator remedied any deterioration or malfunctions of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
	<p>Has the owner/operator taken immediate remedial action to address an imminent or existing hazard?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	725.115(c)
725.115(d)	<p>Does the owner/operator record inspections in a log or summary?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Are these inspection records kept on file for at least 3 years from the date of the inspection?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the inspection record include, at a minimum:</p> <ul style="list-style-type: none"> <li>- the date and time of the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- the name of the inspector? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- a notation of the observations made? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- the date and nature of any repairs or remedial actions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	725.115(d)





Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.117(b)	<p>Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or commingling of incompatible wastes and materials being done so as not to threaten human health or the environment (e.g. fire, pressure, toxic gases, etc...)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.117(b)
	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b>	
725.131	<p><b>Section 725.131 Maintenance and Operation of Facility</b></p> <p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.131
725.132	<p><b>Section 725.132 Required Equipment</b></p> <p>Is the facility equipped with the following, if necessary:</p> <p>a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c) portable fire extinguisher(s), fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.132
725.133	<p><b>Section 725.133 Testing and Maintenance of Equipment</b></p> <p>Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.133
725.134	<p><b>Section 725.134 Access to Communications or Alarm System</b></p> <p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.134
725.135	<p><b>Section 725.135 Required Aisle Space</b></p> <p>Is the facility maintaining adequate aisle space?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.135
725.137	<p><b>Section 725.137 Arrangements with Local Authorities</b></p> <p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	725.137

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
725.151(a)	<b>Section 725.151 Purpose and Implementation of Contingency Plan</b> Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.151(a)
725.151(b)	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.151(b)
725.152(a)	<b>Section 725.152 Content of Contingency Plan</b> Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.152(a)
725.152(c)	Does the plan describe arrangements with: - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.152(c)
725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.152(d)
725.152(e)	Does the plan identify all emergency equipment including: - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.152(e)
725.152(f)	Does the plan include: - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.152(f)
725.153	<b>Section 725.153 Copies of Contingency Plan</b> Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.153
725.154	<b>Section 725.154 Amendment of Contingency Plan</b> Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.154



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.155	<b>Section 725.155 Emergency Coordinator</b> Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.155
725.156	<b>Section 725.156 Emergency Procedures</b> If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>  <b>Note:</b> If the facility has had a release, explain in detail.	725.156
	<b>SUBPART E: MANIFEST SYSTEM, RECORDKEEPING AND REPORTING</b>	
725.171(a)	<b>Section 725.171 Use of Manifest System</b> Does the facility accept waste from off-site? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.173.  For each manifest reviewed, did the facility: 1) sign and date each copy? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) note any discrepancies? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) give one copy to the transporter? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) send one copy to the generator and one copy to the Agency within 30 days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 5) retain one copy for 3 years? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the facility ship hazardous waste in bulk by water or rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "Yes", were the procedures in Section 725.171(b) followed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the facility initiate shipments of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  <b>Note:</b> If "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.	725.171(a)
725.171(d)	Has the owner/operator sent the required documentation to the USEPA within three working days of the receipt of a shipment subject to Section 722, Subpart H (Imports and Exports)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.171(d)
725.172(d)	<b>Section 725.172 Manifest Discrepancies</b> Were manifest discrepancies observed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the owner/operator attempted to resolve discrepancies upon their discovery? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If not resolved within 15 days, has the owner/operator notified the Agency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.172(d)
725.173	<b>Section 725.173 Operating Record</b> a) Does the owner/operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) Is the information recorded as it becomes available and maintained until closure? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) Does the operating record contain the following: 1) description and quantity of each hazardous waste and the methods and dates of treatment, storage and disposal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.173

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<p>2) location and quantity of each hazardous waste within the facility?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- for disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>3) records and results of waste analyses and trial tests performed as specified in the identified Sections?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) summary reports and details of all incidents requiring contingency plan implementation?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>5) inspection records [see Section 725.115(d)]?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>6) monitoring, testing or analytical data as required by:</p> <ul style="list-style-type: none"> <li>- 725.190 (Groundwater Monitoring)</li> <li>- 725.194 (Groundwater Monitoring)</li> <li>- 725.376 (Land Treatment)</li> <li>- 725.378 (Land Treatment)</li> <li>- 725.380(d)(1) (Land Treatment)</li> <li>- 725.447 (Incinerators)</li> <li>- 725.477 (Thermal Treatment)</li> <li>- 725.934(c) through (f) (Air Emissions - Process Vents)</li> <li>- 725.935 (Air Emissions - Process Vents)</li> <li>- 725.963(d) through (i) (Air Emissions - Equipment Leaks)</li> <li>- 725.964 (Air Emissions - Equipment Leaks)</li> <li>- 725.983 through 725.990</li> </ul> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
	<p><b>Note:</b> Circle appropriate Section.</p> <p>7) all closure cost estimates under Section 725.242?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>for disposal facilities, all post-closure cost estimates under Section 725.244?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>8) records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units under an extension of the effective date of land disposal restrictions under Section(s) 728.105, 728.106, 728.108 and 728.107(a)?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>9) for an off-site treatment facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>10) for an on-site treatment facility, the information contained in the notice, and certification and demonstration, required under Section 728.107 or 728.108?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>11) for an off-site land disposal facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>12) for an on-site land disposal facility, the information contained in the notice required of the generator or treatment facility under Section 728.107, except for the manifest numbers, and the certification and demonstration required under Section 728.107 or 728.108, if applicable?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>13) for an off-site storage facility, a copy of the notice, and certification and demonstration, required under Section 728.107 or 728.108?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>14) For an on-site storage facility, the information contained in the notice, and the certification and demonstration if applicable, required under Section 728.107 or 728.108?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	





Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<b>SUBPART G: CLOSURE AND POST-CLOSURE</b>	
725.212(a)	<b>Section 725.212 Closure Plan; Amendment of Plan</b> Was the most current facility closure plan available during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Was the closure plan submitted to the Agency within the time frames specified in this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.212(a)
725.218(a)	<b>Section 725.218 Post-Closure Care Plan</b> Was the most current facility post-closure plan available during the inspection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Was the post-closure plan submitted to the Agency within the time frames specified in this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.218(a)
	<b>SUBPART H: FINANCIAL REQUIREMENTS</b>	
725.242(a)	<b>Section 725.242 Cost Estimate for Closure</b> Has the owner/operator prepared a written estimate of the cost of closing the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.242(a)
725.244(a)	<b>Section 725.244 Cost Estimate for Post-Closure Care</b> Has the owner/operator prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Comments:	725.244(a)



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>	
725.271	<b>Section 725.271 Condition of Containers</b> If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.271
725.272	<b>Section 725.272 Compatability of Waste with Container</b> Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.272
725.273(a)	<b>Section 725.273 Management of Containers</b> Are containers of hazardous waste always closed except to remove or add waste during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.273(a)
725.273(b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.273(b)
725.274	<b>Section 725.274 Inspections</b> Is the owner/operator inspecting the storage area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the storage area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.274
725.276	<b>Section 725.276 Special Requirements for Ignitable or Reactive Waste</b> Are containers holding hazardous waste located at least 15 meters (50 feet) from the facility's property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	725.276
725.277	<b>Section 725.277 Special Requirements for Incompatible Wastes</b> Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>Comments:</b>	725.277

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.278	<b>Section 725.278 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____  Comments:	
		725.278
	<b>SUBPART J: TANK SYSTEMS</b>  <b>Section 725.290 Applicability</b> Does the facility store or treat hazardous waste in tanks? Yes _____ No _____ N/A _____ If "No", skip Subpart J.	
725.290	a) Tank systems that are used to store or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	
725.291(a)	<b>Section 725.291 Assessment of Existing Tank Systems</b> For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes <input checked="" type="checkbox"/> No _____ N/A _____	725.291(a)
725.291(b)	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 3) existing corrosion protection measures? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 4) documented age of the tank system? Yes <input checked="" type="checkbox"/> No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes <input checked="" type="checkbox"/> No _____ N/A _____	725.291(b)
725.291(c)	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	<b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	725.291(c)



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.292(a)	<p><b>Section 725.292 Design and Installation of New Tank Systems or Components</b>            For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?            Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment?            Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) hazardous characteristics of the waste(s) to be handled?            Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?            Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic?            Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave?            Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>* IRPE - Independent Registered Professional Engineer</p>	725.292(a)
725.292(g)	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?            Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.292(g)
725.293(a)	<p><b>Section 725.293 Containment and Detection of Releases</b>            Is secondary containment provided for any new tank system before being put into service?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Does an existing tank, used to store F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>or            If the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>For tanks that store wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	725.293(a)
725.293(b)	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?            Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	725.293(b)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.293(c)	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	725.293(c)
725.293(d)	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.293(d)
725.293(e)	<p>Does the external liner system(s), vault system(s) and/or double-walled tanks meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.293(e)
725.293(f)	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c) except for:</p> <p>1) aboveground piping (exclusive of flanges, joints, valves and connections) that are inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) welded flanges, joints and connections that are inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) sealless or magnetic coupling pumps and sealless valves that are inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>4) pressurized aboveground piping systems with automatic shut-off devices that are inspected daily? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.293(f)
725.293(i)	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	725.293(i)
725.294(a)	<p><b>Section 725.294 General Operating Requirements</b></p> <p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	725.294(a)



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.294(b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) overfill prevention controls? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) sufficient freeboard in uncovered tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.294(b)
725.294(c)	<b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
725.295(a)	<b>Section 725.295 Inspections</b> Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) the aboveground portion of the tank system for corrosion or releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) data from monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) the construction materials and the area immediately surrounding the external portion of the system? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.295(a)
725.295(b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.295(b)
725.295(c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.295(c)
725.296	<b>Section 725.296 Response to Leaks or Spills and Disposition of Tank Systems</b> If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> b) removed applicable waste from the system within 24 hours of detection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.296
725.296(d)	d) notified the Agency within 24 hours of detection of release? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.296(d)
	<b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.296(e)	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous waste without release for the intended life of the system?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	725.296(e)
725.297(a)	<p><b>Section 725.297 Closure and Post-Closure Care</b>  At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.297(a)
725.297(a)	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
725.297(b)	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	725.297(b)
725.297(c)	<p>If the owner/operator has a tank system which does not have secondary containment that meets the requirements of Section 725.293(b) through (f), and which is not exempt from the secondary containment requirements in accordance with Section 725.293(g), has the owner/operator complied with items 1) through 5) in this Section?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.297(c)
725.298(a)	<p><b>Section 725.298 Special Requirements for Ignitable or Reactive Waste</b>  Are ignitable or reactive wastes placed in a tank system?  Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:  - the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>or  Is the waste stored or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A _____</p> <p>or  Is the tank used solely for emergencies?  Yes _____ No _____ N/A _____</p>	725.298(a)



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.298(b)	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line (see NFPA 30)? Yes _____ No _____ N/A _____	725.298(b)
725.299	<b>Section 725.299 Special Requirements for Incompatible Wastes</b> Are incompatible wastes/materials placed in the same tank? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "No", skip to Section 725.300. Is the facility in compliance with Section 725.117(b)? Yes _____ No _____ N/A _____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless the facility is in compliance with Section 725.117(b)? Yes _____ No _____ N/A _____	725.299
725.300	<b>Section 725.300 Waste Analysis and Trial Tests</b> Has the owner/operator performed additional waste analyses/trial tests as required in this Section whenever a tank system is to be used to chemically treat or store a hazardous waste that is substantially different from waste previously treated or stored in that tank system; or to chemically treat a hazardous waste with a substantially different process than any previously used in that tank system? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.300
	Comments:	
725.302	<b>Section 725.302 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.302
	Comments:	
	Tanks in Bld 64 identified in 1991 and the building is undergoing closure.	725.302

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.964(k)	Is a log kept on determining exemptions as specified in this Subpart? Yes _____ No _____ N/A _____	725.964(k)
725.964(l)	Is the operating and leak information being maintained for 3 years? Yes _____ No _____ N/A _____	725.964(l)
725.964(m)	Is the documentation for alternative compliance kept in accordance with this Subpart? Yes _____ No _____ N/A _____	725.964(m)
	COMMENTS:	
	<b>SUBPART CC: AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS</b>	
725.980	<p><b>Section 725.980 Applicability</b></p> <p><b>Note:</b> This Subpart only applies to owners and operators that treat, store or dispose hazardous waste in tanks, surface impoundments, or containers subject to Subpart I, J, or K of Part 725, except as Section 725.101 and subsection 725.980(b) provide otherwise, <u>that have an average volatile organic concentration of 500 ppmw or greater.</u></p> <p><b>Note:</b> Do any of the following general exclusions, referenced in Section 725.980(a), apply for the above regulated tanks, surface impoundments, and/or containers?</p> <ol style="list-style-type: none"> <li>1. Wastewater treatment unit (725.101(c)(10))</li> <li>2. Emergency spill management unit (725.101(c)(11))</li> <li>1. Hazardous waste recycling unit (725.101(c)(6))</li> <li>2. Elementary neutralization unit (725.101(c)(10))</li> <li>3. Totally enclosed treatment unit (725.101(c)(9))</li> <li>4. Satellite accumulation area (725.101(c)(7) &amp; 722.134(c)(1))</li> </ol> <p><b>Note:</b> Do any of the following specific exclusions listed in Section 725.980(b) apply for the above regulated tanks, surface impoundments, and/or containers?</p> <ol style="list-style-type: none"> <li>1. Waste was placed in the unit prior to Oct. 6, 1996 and none has been added since. (725.980(b)(1))</li> <li>2. The container has a design capacity less than or equal to 0.1m<sup>3</sup> (3.5ft<sup>3</sup> or 26.4 gal). (725.980(b)(2))</li> <li>3. The tank or surface impoundment has stopped receiving waste and is undergoing closure pursuant to an approved closure plan. (725.980(b)(3) &amp; 725.980(b)(4))</li> <li>4. The unit is used solely for on-site treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program. (725.980(b)(5))</li> <li>5. The unit is used solely to manage radioactive mixed waste. (725.980(b)(6))</li> <li>6. The unit operates with an emission control device regulated by and in accordance with Clean Air Act regulations. (725.980(b)(7))</li> <li>7. The unit operates with a process vent as defined in 725.931, regulated under Subpart AA. (725.980(b)(8))</li> </ol> <p><b>Note:</b> If a tank or container is used for the management of hazardous waste generated by organic peroxide manufacturing and its associated lab operations, see Section 725.980(d).</p>	
725.982(a)(1)	<p><b>Section 725.982 Schedule for Implementation of Air Emission Standards</b></p> <p>Has the owner or operator of a facility in existence on December 6, 1996, and subject to Subpart I, J, or K of this Part, installed and begun operating all control equipment for waste management units to comply with Subpart CC, or completed modifications of production or treatment processes to satisfy exemption criteria of Section 725.983(c) by December 8, 1997?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	725.982(a)(1)
725.982(b)(1)	Has the owner or operator of a facility or unit in existence on the effective date of the statutory or regulatory amendments that render the facility subject to Subpart I, J, or K installed and begun operating all control equipment for waste management units to comply with Subpart CC, or completed modifications of production or	



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	treatment processes to satisfy exemption criteria of Section 725.983(c) by either the effective date of the amendment, or no later than 30 months after the effective date of the amendment and maintained an implementation schedule pursuant to Section 725.982(b)(2)(B)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.982(b)(1)
725.982(c)	Has the owner or operator of a facility or unit that becomes newly subject to the requirements of Subpart CC after December 8, 1997 due to an action other than those described in subsection 725.982(b) immediately complied with all applicable requirements (i.e. control devices)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.982(c)
725.983(b)	<b>Section 725.983 Standards: General</b> Has the owner or operator controlled air pollutant emissions from each hazardous waste management unit in accordance with the standards in Sections 725.985 through 725.988, except as provided for in subsection 725.983(c) (less than 500 ppmw VO concentration)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.983(b)
725.984(a)(1)	<b>Section 725.984 Waste Determination Procedures</b> Has the owner or operator determined the average VO concentration at the point of waste origination for each hazardous waste placed in a waste management unit exempted under Section 725.983(c)(1) (VO concentration less than 500 ppmw)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.984(a)(1)
725.984(a)(2)	Has the owner or operator determined the average VO concentration of a hazardous waste at the point of waste origination, as required by subsection 725.984(a)(1), using either: A) direct measurement (725.984(a)(3)) or B) knowledge of the waste (725.984(a)(4))? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.984(a)(2)
	<b>Note:</b> Documentation is required for either method of determination.	
725.984(b)(1)	Has the owner or operator performed the applicable waste determination for each treated hazardous waste placed in a waste management unit exempted under Sections 725.983(c)(2)(A) through 725.983(c)(2)(F) from using air emission controls? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.984(b)(1)
725.984(b)(2)	Has the owner or operator designated and recorded the specific provision in Section 725.983(c)(2) under which the waste determination for each treated hazardous waste is being performed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Has the waste determination for the treated hazardous waste been performed using the applicable procedures specified in subsections 725.984(b)(3) through 725.984(b)(9)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.984(b)(2)
725.984(c)(1)	Has the owner or operator determined the maximum organic vapor pressure for each hazardous waste placed in a tank using Tank Level 1 controls in accordance with Section 725.985(c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.984(c)(1)
725.984(c)(2)	Has the owner or operator used either: A) direct measurement (725.984(c)(3)) or B) knowledge of the waste (725.984(c)(4)) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> to determine the maximum organic vapor pressure that is representative of the hazardous waste composition stored or treated in the tank?	725.984(c)(2)
	<b>Note:</b> Documentation is required for either method of determination.	
725.984(d)	Has the owner or operator followed the procedure for determining no detectable organic emissions, specified in subsections 725.984(d)(1) through 725.984(d)(9), for the purpose of complying with Subpart CC? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.984(d)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.986(g)	<p><b>Note:</b> Following the initial inspection and monitoring of the cover as required by the applicable provisions of this Subpart, subsequent inspection and monitoring may be performed at intervals longer than one year in the case when inspecting or monitoring the cover would expose a worker to dangerous, hazardous, or other unsafe conditions.</p> <p>In this case, has the owner or operator designated the cover as <input type="checkbox"/> unsafe to inspect and monitor <input type="checkbox"/> and complied with the following requirements?</p> <p>1. Prepared a written explanation for the cover stating the reasons why the cover was unsafe to visually inspect or to monitor, if required? Yes _____ No _____ N/A _____</p> <p>2. Developed and implemented a written plan and schedule to inspect and monitor the cover using the procedures specified in the applicable sections of the Subpart as frequently as practicable during those times when a worker can safely access the cover. Yes _____ No _____ N/A _____</p> <p><b>Note:</b> The provisions of this Section apply to the control of air pollution emissions from containers for which Section 725.983(b) references the use of this Section for such air emissions control.</p>	
725.987(b)(1)	<p><b>Section 725.987 Standards: Containers</b></p> <p>Has the owner or operator who controls air pollutant emissions from containers subject to this Section complied with the following requirements:</p> <p>A) For a container having a design capacity greater than 26 gallons and less than or equal to 120 gallons, are emissions controlled in accordance with Container Level 1 standards specified in subsection 725.987(c)? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>B) For a container having a design capacity greater than 120 gallons that is not in light material service, are emissions controlled in accordance with Container Level 1 standards specified in subsection 725.987(c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) For a container having a design capacity greater than 120 gallons that is in light material service, are emissions controlled in accordance with Container Level 2 standards specified in subsection 725.987(d)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.986(g)
725.987(b)(2)	<p>When a container having a design capacity greater than 26 gallons is used for treatment by stabilization, are the emissions being controlled by Container Level 3 standards specified in subsection 725.987(c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(b)(1)
725.987(c)(1)	<p>Containers using Container Level 1 controls must be one of the following:</p> <p>A) a container that meets applicable U.S. Department of Transportation (DOT) regulations as specified in subsection 725.987(f). Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>B) a container equipped with a cover and closure devices so there are no visible holes, gaps, or other open spaces into the interior. Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) an open-top container in which an organic-vapor suppressing barrier is placed such that no hazardous waste is exposed to the atmosphere? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(b)(2)
725.987(c)(2)	<p>Are containers that are used to meet requirements of subsection 725.987(c)(1)(B) or subsection 725.987(c)(1)(C) equipped with covers and closure devices composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and maintain the equipment integrity while it is in service? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(c)(1)
725.987(c)(3)	<p>Whenever a hazardous waste is in a container using Container Level 1 controls, has the owner or operator maintained each cover and closure device in the closed position? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p><b>Note:</b> Opening is allowed as specified in subsections 725.987(c)(3)(A)-(E)</p>	725.987(c)(2)
		725.987(c)(3)



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.987(c)(4)	<p>Has the owner or operator of containers using Container Level 1 controls visually inspected and repaired as necessary the containers, covers, and closure devices as follows:</p> <p>A) within 24 hours after a container holding hazardous waste is accepted at a facility?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>B) a container used for managing hazardous waste remaining at the facility for a period of one year or more inspected initially and at least every 12 months.  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) Is the first effort at repair made within 24 hours after detection?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Are repairs completed within 5 calendar days after detection or is the waste removed from the container until the container is repaired?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(c)(4)
725.987(c)(5)	<p>Has a copy of the procedure used to determine that containers with a capacity of 120 gallons or greater, that do not meet subsection 725.987(f), are not managing hazardous waste in light material service been maintained at the facility?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(c)(5)
725.987(d)(1)	<p>Are all containers using Container Level 2 controls meeting one of the following:</p> <p>A) applicable U.S. Department of Transportation (DOT) regulations as specified in subsection 725.987(f)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>B) operated with no detectable organic emissions in accordance with subsection 725.981 and subsection 725.987(g)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) demonstrated within the preceding 12 months to be vapor-tight using Method 27 in accordance with Subsection 725.987(h)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(d)(1)
725.987(d)(2)	<p>Has the transfer of hazardous waste in or out of a container using Container Level 2 controls been conducted in a manner that minimizes exposure of the hazardous waste to the atmosphere?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(d)(2)
725.987(d)(3)	<p>Whenever a hazardous waste is in a container using Container Level 2 controls, has the owner or operator maintained each cover and closure devices in the closed position?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Note: Opening is allowed as specified in subsections 725.987(d)(3)(A)-(E)</p>	725.987(d)(3)
725.987(d)(4)	<p>Has the owner or operator of containers using Container Level 2 controls inspected and repaired, as necessary, the containers, covers and closure devices as follows:</p> <p>A) within 24 hours after a container holding hazardous waste is accepted at a facility?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>B) a container used for managing hazardous waste remains at the facility for a period of one year or more, inspected initially and at least every 12 months.  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) Is the first effort at repair made within 24 hours after detection?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Are repairs completed with 5 calendar days after detection or is the waste removed from the container until the container is repaired?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.987(d)(4)





Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.988(b)(4)	Does the owner or operator inspect and monitor the closed-vent system in accordance with the procedures specified in section 725.933(k)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
725.988(c)(1)	The control device must be one of the following:  A) A control device designed and operated to reduce the total organic content of the inlet vapor stream vented to the control device by at least 95% by weight. Yes _____ No _____ N/A <input checked="" type="checkbox"/>  B) An enclosed combustion device designed and operated in accordance with the requirements of Section 725.933(c). Yes _____ No _____ N/A <input checked="" type="checkbox"/>  C) A flare designed and operated in accordance with the requirements of Section 725.933(d). Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(b)(4)  725.988(c)(1)
725.988(c)(2)	Has the owner or operator that elects to use a closed-vent system and control device to comply with the requirements of this Section complied with the requirements specified in subsections 725.988(c)(2)(A) through 725.988(c)(2)(F)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(2)
725.988(c)(2)(A)	A) Have periods of planned routine maintenance (of the control device) not exceeded 240 hours per year? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  <b>Note:</b> The specifications and requirements in subsections 725.988(c)(1)(A), (c)(1)(B), and (c)(1)(C) for control devices do not apply during periods of planned routine maintenance or a control system malfunction.	725.988(c)(2)(A)
725.988(c)(2)(D)	D) Does the owner or operator keep a written record of the information specified in subsection 725.990(e)(1)(E) (i.e., periods of noncompliance with subsections 725.988(c)(1)(A), (c)(1)(B), or (c)(1)(C)) due to periods of planned routine maintenance or a control system malfunction? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(2)(D)
725.988(c)(2)(E)	E) Has the owner or operator corrected control device system malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of air pollutants? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(2)(E)
725.988(c)(2)(F)	F) Does the owner or operator operate the closed-vent system so that gases, vapors, or fumes are not actively vented to the control device during periods of planned maintenance or control device system malfunction (i.e., periods when the control device is not operating or not operating normally), except in cases when it is necessary to vent the gases, vapors, or fumes to avoid an unsafe condition or to implement malfunction corrective actions or planned maintenance actions. Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(2)(F)
725.988(c)(3)	If the owner or operator using a carbon adsorption system to comply with subsection 725.988(c)(1) is it being operated and maintained in accordance with the following requirements? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(3)
725.988(c)(3)(A)	A) Following the initial startup of the control device, is all activated carbon in the control device replaced with fresh carbon on a regular basis in accordance with the requirements of Section 725.933(g) or 725.933(h)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(3)(A)
725.988(c)(3)(B)	B) Is all carbon that is a hazardous waste and that has been removed from the control device being managed in accordance with the requirements of Section 725.933(m), regardless of the average volatile organic concentration of the carbon? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(3)(B)
725.988(c)(4)	If a control device other than a thermal vapor incinerator, flare, boiler, process heater, condenser, or carbon adsorption system is being used to comply with subsection 725.988(c)(1), is the control device being operated and maintained in accordance with the requirements of Section 725.933(i)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.988(c)(4)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.988(c)(5)(A)	<p>A) Has the owner or operator demonstrated that a control device achieves the performance requirements of subsection 725.988(c)(1) by using either a performance test as specified in subsection 725.988(c)(5)(C), or a design analysis as specified in subsection 725.988(c)(5)(D)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Note: The following are exempt from the requirements of subsections 725.988 (c)(5)(C) and 725.988 (c)(5)(D):</p> <ul style="list-style-type: none"> <li>i. A flare;</li> <li>ii. A boiler or process heater with a design heat input capacity of 44 megawatts or greater;</li> <li>iii. A boiler or process heater into which the vent stream is introduced with the primary fuel;</li> <li>iv. A boiler or industrial furnace burning hazardous waste for which the owner or operator has been issued a final permit under 35 Ill. Adm. Code 702, 703, and 705 and has designed and operates in accordance with the interim status requirements of 35 Ill. Adm. Code 726, Subpart H; or</li> <li>v. A boiler or industrial furnace burning hazardous waste for which the owner or operator has designed and operates in accordance with the interim status requirements of 35 Ill. Adm. Code 726, Subpart H.</li> </ul>	725.988(c)(5)(A)
725.988(c)(5)(B)	<p>B) Has the owner or operator of a flare demonstrated the performance of each flare in accordance with the requirements specified in Section 725.933(c)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.988(c)(5)(B)
725.988(c)(5)(C)	<p>C) For a performance test conducted to meet the requirements of subsection 725.988(c)(5)(A) of this Section, has the owner or operator used the test methods and procedures specified in Section 725.934(c)(1) through (c)(4)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.988(c)(5)(C)
725.988(c)(5)(D)	<p>D) For a design analysis conducted to meet the requirements of subsection 725.988(c)(5)(A) of this Section, does the design analysis meet the requirements specified in Section 725.935(b)(4)(C)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.988(c)(5)(D)
725.988(c)(5)(E)	<p>E) Has the owner or operator demonstrated that a carbon adsorption system achieves the performance requirements of subsection 725.988(c)(1)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.988(c)(5)(E)
725.988(c)(6)	<p>Note: If the owner or operator and the Agency do not agree on a demonstration of control device performance using a design analysis, the disagreement must be resolved using the results of a performance test performed by the owner or operator in accordance with the requirements of subsection 725.988(c)(5)(C). The Agency may choose to have an authorized representative observe the performance test.</p>	725.988(c)(6)
725.988(c)(7)	<p>Has the owner or operator inspected and monitored the closed-vent system and control device in accordance with the procedures specified in Section 725.933(f)(2) and (k)?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Have readings from each monitoring device required by subsection 725.933(f)(2) been inspected at least once each operating day to check control device operation?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Were any necessary corrective measures immediately implemented to ensure the control device is operated in compliance with the requirements of this Section?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.988(c)(7)
725.989(a)	<p><b>Section 725.989 Inspection and Monitoring Requirements</b></p> <p>Has the owner or operator inspected and monitored air emission control equipment used to comply with this Subpart in accordance with the requirements specified in Sections 725.985 through 725.988?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.989(a)



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.989(b)	Has the owner or operator developed and implemented a written plan and schedule to perform the inspections and monitoring required by subsection 725.989(a) and incorporated this plan and schedule into the facility inspection plan required under Section 725.115?	725.989(b)
725.990(a)	<p><b>Section 725.990 Recordkeeping Requirements</b></p> <p>Has the owner or operator of a facility subject to the requirements in this Subpart recorded and maintained the information specified in subsections (b) through (j) of this Section, as applicable to the facility?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Except for air emission control equipment design documentation and information required by subsection (j) of this Section, have records required by this Section been maintained in the operating record for a minimum of three years?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Have air emission control equipment design documentation been maintained in the operating record until the air emission control equipment is replaced or is otherwise no longer in service?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Has information required by subsections (i) and (j) of this Section been maintained in the operating record for as long as the waste management unit is not using air emission controls specified in Sections 725.985 through 725.988, in accordance with the conditions specified in Section 725.980(d) or (b)(7), respectively?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	725.990(a)
725.990(b)(1)	<p>Do the records for a tank using air emission controls include the following information?</p> <p>A) A tank identification number?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>B) A record for each inspection required by Section 725.985 that includes the following information:</p> <p>i) Date inspection was conducted.  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>ii) For each defect detected during the inspection, the location of the defect, the date of detection, and the corrective action taken to repair the defect?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>In the event that repair of the defect is delayed in accordance with the provisions of Section 725.985, has the owner or operator recorded the reason for the delay and the date that completion of repair of the defect is expected?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	725.990(b)(1)
725.990(b)(2)	<p>Has the owner or operator recorded the following information, as applicable to the tank:</p> <p>A) For a fixed roof tank using Tank Level One controls, records for each determination for the maximum organic vapor pressure of the hazardous waste in the tank, including the following information:</p> <p>i) Date and time the samples were collected?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>ii) The analysis method used and the analytical results?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>iii) The analysis results?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>B) For an internal floating roof using tank level 2 controls, documentation describing the floating roof design?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	725.990(b)(2)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<p>C) For an external floating roof using tank level 2 controls, documentation including the following information:</p> <p>i) The floating roof design and the dimensions of the tank? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>ii) Records for each seal gap inspection including the date the measurements were performed, the raw data obtained for the measurements, and the calculations of the total gap surface area. In the event that the seal gap measurements do not conform to the specifications in Section 725.985(f)(1), the records must include a description of the repairs that were made, the date the repairs were made, and the date the tank was emptied, if necessary? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>D) For an enclosure, documentation including the following:</p> <p>i) Records for the most recent set of calculations and measurements performed by the owner or operator to verify that the enclosure meets the criteria of a permanent total enclosure as specified in <input type="checkbox"/> Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure <input type="checkbox"/> under 40 CFR 52.741, appendix B, incorporated by reference 35 Ill. Adm. Code 720.111? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>ii) Records required for the closed-vent system and control device in accordance with the requirements of subsection (e) of this Section? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
725.990(c)	Has the owner or operator of a surface impoundment prepared and maintained records in accordance with the requirements in subsections 725.990(c)(1) through 725.990(c)(4)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.990(c)
725.990(d)	Has the owner or operator using Container Level 3 air emission controls prepared and maintained records including the following information:	
	<p>1) Records for the most recent set of calculations and measurements performed by the owner or operator to verify that the enclosure meets the criteria of a permanent total enclosure as specified in <input type="checkbox"/> Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure <input type="checkbox"/> under 40 CFR 52.741, appendix B, incorporated by reference in 35 Ill. Adm. Code 720.111. Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) Records required for the closed-vent system and control device in accordance with the requirements of subsection (e) of this Section. Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(d)
725.990(e)	Has the owner or operator using a closed vent system and control device in accordance with the requirements of 725.988 prepared and maintained records including the following information:	
	1) Documentation for the closed-vent system and control device that includes:	
725.990(e)(1)(A)	A) Certification that is signed and dated by the owner or operator stating that the control device is designed to operate at the performance level documented by a design analysis as specified in subsection (e)(1)(B) of this Section or by performance tests as specified in subsection (e)(1)(C) of this Section when the tank, surface impoundment, or container is or would be operating at capacity or the highest level reasonably expected to occur. Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.990(e)(1)(A)
725.990(e)(1)(B)	B) If a design analysis is used, does the documentation include information prepared by the owner or operator or provided by the control device manufacturer or vendor that describes the control device design in accordance with Section 725.935(b)(4)(C) and certification by the owner or operator that the control equipment meets the applicable specifications. Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.990(e)(1)(B)
725.990(e)(1)(C)	C) If performance tests are used, does the documentation include a performance test plan as specified in Section 725.935(b)(3) and all test results. Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.990(e)(1)(C)
725.990(e)(1)(D)	D) Is additional information as required by Section 725.935(c)(1) and (c)(2) provided as applicable? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.990(e)(1)(D)



Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
725.990(e)(1)(E)	<p>E) Has the owner or operator recorded the following information as applicable:</p> <p>i) A description of the planned routine maintenance that is anticipated to be performed for the control device during the next six-month period. This description must include the type of maintenance necessary, planned frequency of maintenance, and lengths of maintenance periods?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>ii) A description of the planned routine maintenance that was performed for the control device during the previous six month period. This description must include the type of maintenance performed and the total number of hours during those six months that the control device did not meet the requirements of Section 725.988(c)(1)(A), (c)(1)(B), or (c)(1)(C), as applicable, due to planned routine maintenance?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(e)(1)(E)
725.990(e)(1)(F)	<p>F) Has the owner or operator recorded the following information as applicable:</p> <p>i) The occurrence and duration of each malfunction of the control device system?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>ii) The duration of each period during a malfunction when gases, vapors, or fumes are vented from the waste management unit through the closed-vent system to the control device while the control device is not properly functioning?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>iii) Actions taken during periods of malfunction to restore a malfunctioning control device to its normal or usual manner of operation?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(e)(1)(F)
725.990(e)(1)(G)	<p>G) Has the owner or operator recorded information concerning the management of carbon removed from a carbon adsorption system conducted in accordance with Section 725.988(c)(3)(B)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(e)(1)(G)
725.990(f)	<p>Has the owner or operator of a tank, surface impoundment, or container, exempted from standards in accordance with the provisions of Section 725.983(c) of this Subpart, prepared and maintained the following records as applicable:</p> <p>1) For tanks, surface impoundments, or containers exempted under the hazardous waste organic concentration conditions specified in Section 725.983(c)(1) or 725.984(c)(2)(A) through (c)(2)(F), information used for each waste determination (e.g., test results, measurements, calculations, and other documentation). If analysis results for waste samples are used for the waste determination, then the owner or operator shall record the date, time, and location that each waste sample is collected in accordance with the applicable requirements of 725.984 of this Subpart?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For tanks, surface impoundments, or containers exempted under the provisions of Section 725.983(c)(2)(G) or (c)(2)(H), the identification number for the incinerator, boiler, or industrial furnace in which the hazardous waste is treated?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(f)
725.990(g)	<p>For any cover the owner or operator has designated as unsafe to inspect and monitor, has the following information been recorded in a log in the facility operating record:</p> <p>Identification numbers for waste management units with covers that are unsafe?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>An explanation why each management unit is unsafe?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>A plan and schedule for inspecting and monitoring each cover?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(g)
725.990(i)	<p>For those organic peroxide units that are subject to 725.980(d), has the owner or operator recorded and maintained the following information:</p> <p>1) A list of the individual organic peroxides manufactured at the facility that meet the conditions of 725.980(d)(1)  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(i)

Regulation	RCRA TSD FACILITY INSPECTION CHECKLIST (PART 725)	Violation
	<p>2) A description of how the organic peroxide wastes identified in (i)(1) are managed at the facility identification number for the unit, the purpose and placement of the unit in management train of this hazardous waste, and the procedures used to dispose of the waste.  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) An explanation of why air emission controls would be unsafe to use on this unit?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
725.990(j)(1)	<p>Has the owner or operator recorded and maintained any certification that the waste management unit not using air emission controls in accordance with the provisions of Section 265.980(b)(7) is equipped with and operating air emission controls in accordance the requirements of an applicable Clean Air Act regulation codified under CFR parts 60-63.  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(j)(1)
725.990(j)(2)	<p>Has the owner or operator included in its records an identification of the specific federal requirements codified under 40 CFR parts 60-63 with which the waste management unit is in compliance.  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.990(j)(2)
	<b>SUBPART DD: CONTAINMENT BUILDINGS</b>	
725.1101(a)(1)	<p>Is the containment building completely enclosed with a floor, walls and roof to prevent exposure to the elements?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.1101(a)(1)
725.1101(a)(2)	<p>Are the floors and walls of the secondary containment building designed and constructed:</p> <p>To have sufficient strength to support themselves, the waste contents, personnel, and any heavy equipment that operate within the unit?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>To prevent failure due to pressure gradients, settlement, compression, uplift, physical contact with hazardous waste, climatic conditions, or the stresses of daily operation, including the contact of heavy equipment with containment walls?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>To be chemically compatible with wastes?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>To meet the structural integrity requirements established by professional organizations such as the American Concrete Institute (ACI) or ATSM?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> Exceptions to the structural integrity requirements apply to windows and light doors that are dust barriers and are designed and operated in a fashion that wastes do not come into contact with these openings.</p>	725.1101(a)(2)
725.1101(a)(3)	<p>Are incompatible wastes or treatment reagents that could cause the unit or secondary containment system to leak, corrode, or fail, kept from the containment unit?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.1101(a)(3)
725.1101(a)(4)	<p>Does the building have a primary barrier designed to withstand the movement of personnel, waste, and handling equipment during the operating life of the unit.  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.1101(a)(4)
725.1101(b)	<b>Note:</b> The following requirements are for containment building units used to manage waste with free liquids or treated with free liquids.	
725.1101(b)(1)	<p>Is the primary barrier designed and constructed of materials to prevent the migration of hazardous constituents into the barrier?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.1101(b)(1)
725.1101(b)(2)	<p>Does the unit have a liquid collection and removal system to minimize the accumulation of liquid on the primary barrier?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.1101(b)(2)
725.1101(b)(2)(A)	<p>Is the liquid removal system sloped to drain liquids from the system?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.1101(b)(2)(A)



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Rock Island Arsenal  
IL5210021833  
FOS File

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DATE: June 22, 2004

TIME: 10:30 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the west.

PHOTOGRAPH NUMBER: 1

PHOTOGRAPH FILE NAME:  
1618130001~06222004-001.jpg

COMMENTS: Satellite accumulation  
area for Building 25 (Test Range).



DATE: June 22, 2004

TIME: 10:31 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the west.

PHOTOGRAPH NUMBER: 2

PHOTOGRAPH FILE NAME:  
1618130001~06222004-002.jpg

COMMENTS: Satellite accumulation  
area for Building 25 (Test Range).



DOCUMENT FILE NAME:  
1618130001~06222004.doc

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Rock Island Arsenal  
IL5210021833  
FOS File

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DATE: June 22, 2004

TIME: 10:33 AM

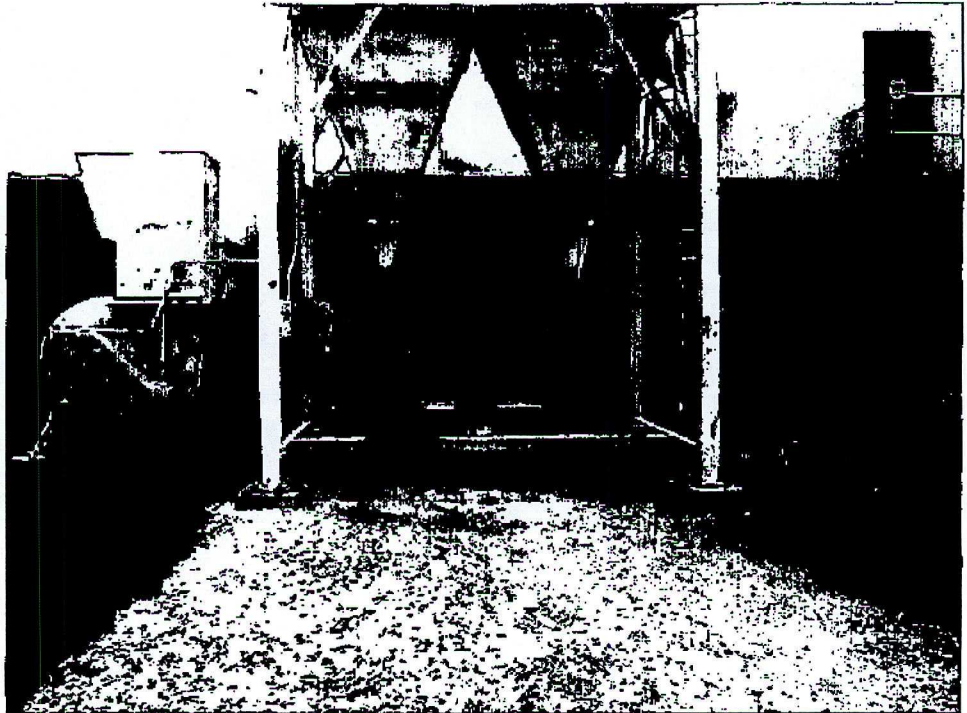
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the northwest.

PHOTOGRAPH NUMBER: 3

PHOTOGRAPH FILE NAME:  
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COMMENTS: Satellite accumulation  
area for Building 25 (Test Range).



DATE: June 22, 2004

TIME: 10:34 AM

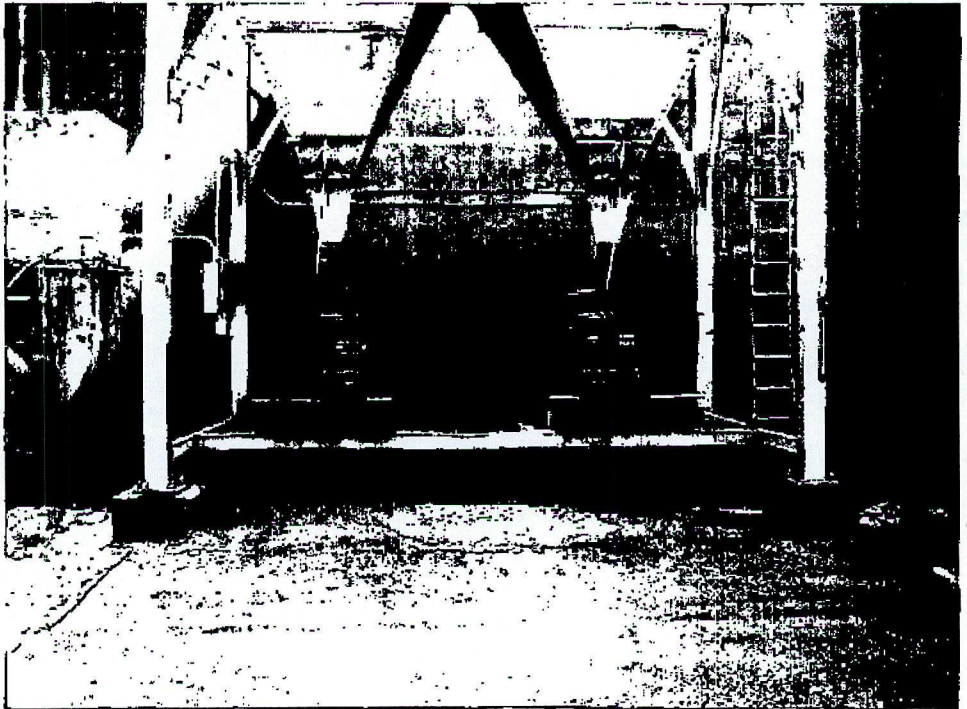
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the east.

PHOTOGRAPH NUMBER: 4

PHOTOGRAPH FILE NAME:  
1618130001-06222004-004.jpg

COMMENTS: Satellite accumulation  
area for Building 25 (Test Range).



DOCUMENT FILE NAME:  
1618130001-06222004.doc



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Rock Island Arsenal  
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FOS File

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DATE: June 22, 2004

TIME: 10:34 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the east.

PHOTOGRAPH NUMBER: 5

PHOTOGRAPH FILE NAME:  
1618130001~06222004-005.jpg

COMMENTS: Satellite accumulation  
area for Building 25 (Test Range).



DATE: June 22, 2004

TIME: 10:42 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the east.

PHOTOGRAPH NUMBER: 6

PHOTOGRAPH FILE NAME:  
1618130001~06222004-006.jpg

COMMENTS: Satellite accumulation  
area for Building 159.



DOCUMENT FILE NAME:  
1618130001~06222004.doc

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FOS File

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DATE: June 22, 2004

TIME: 10:48 AM

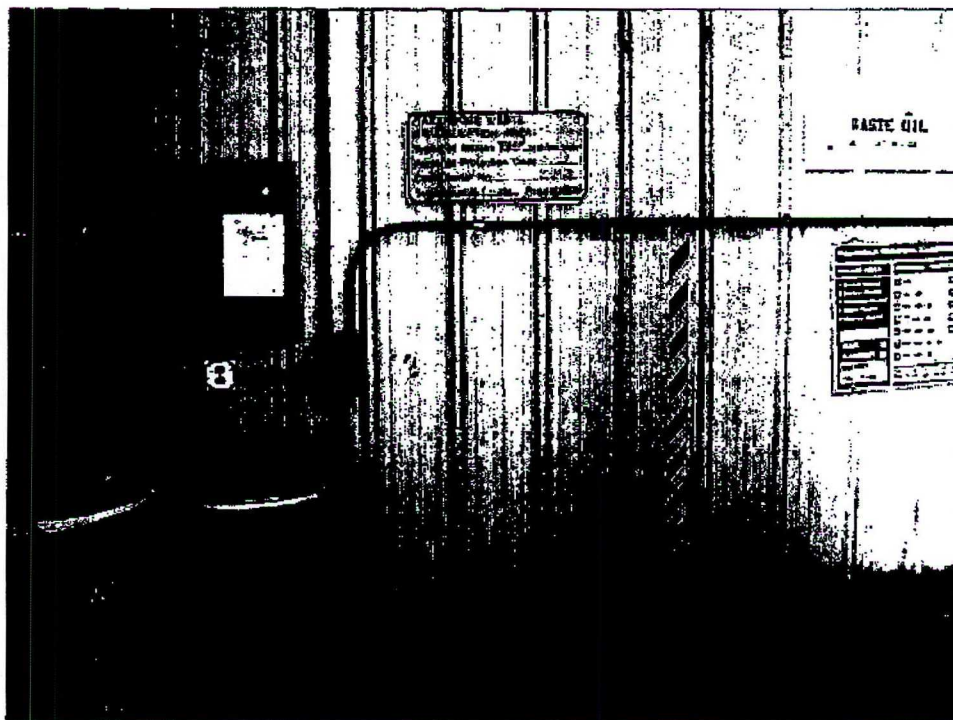
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 7

PHOTOGRAPH FILE NAME:  
1618130001~06222004~007.jpg

COMMENTS: Satellite accumulation  
area for Building 112.



DATE: June 22, 2004

TIME: 10:56 AM

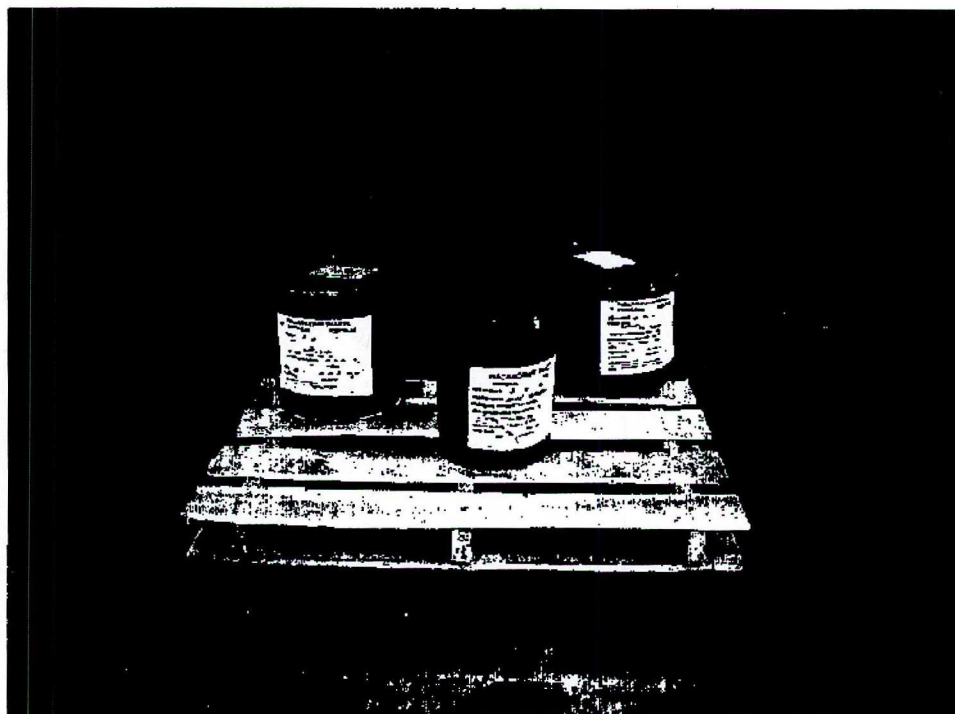
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the west.

PHOTOGRAPH NUMBER: 8

PHOTOGRAPH FILE NAME:  
1618130001~06222004~008.jpg

COMMENTS: Accumulation area  
Building 144.



DOCUMENT FILE NAME:  
1618130001~06222004.doc



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DATE: June 22, 2004

TIME: 11:00 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 9

PHOTOGRAPH FILE NAME:  
1618130001~06222004-009.jpg

COMMENTS: Accumulation area  
Building 140.



DATE: June 22, 2004

TIME: 11:06 AM

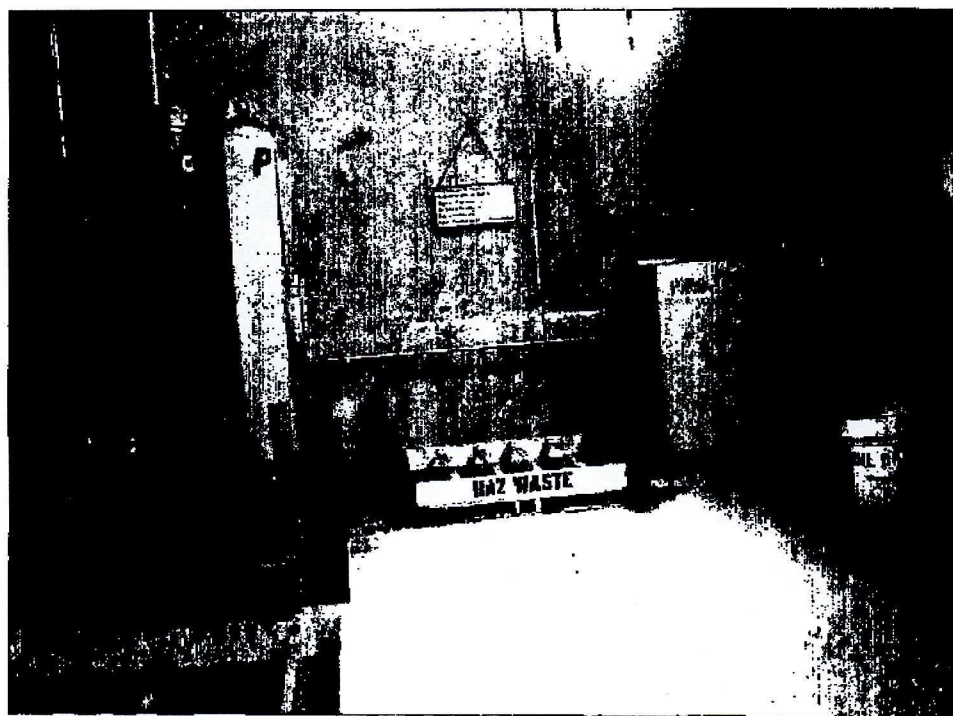
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 10

PHOTOGRAPH FILE NAME:  
1618130001~06222004-010.jpg

COMMENTS: Satellite accumulation  
area for Building 299E (Paint Line).



DOCUMENT FILE NAME:  
1618130001~06222004.doc

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Rock Island Arsenal  
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DATE: June 22, 2004

TIME: 11:15 AM

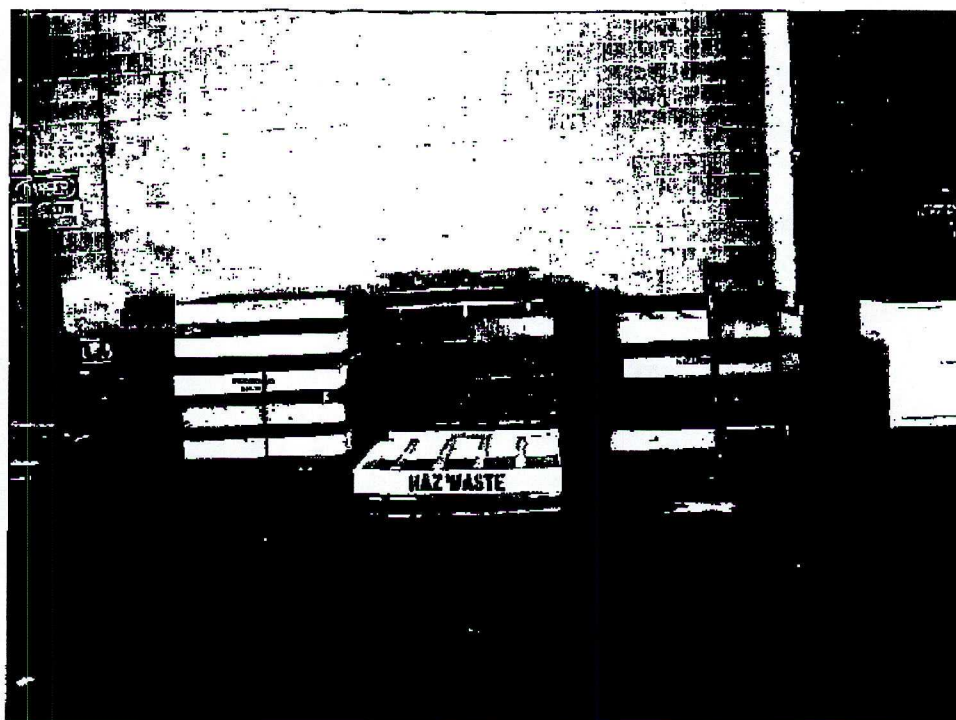
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the west.

PHOTOGRAPH NUMBER: 11

PHOTOGRAPH FILE NAME:  
1618130001~06222004-011.jpg

COMMENTS: Satellite accumulation  
area for Building 299W (Disassembly).



DATE: June 22, 2004

TIME: 11:28 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the south.

PHOTOGRAPH NUMBER: 12

PHOTOGRAPH FILE NAME:  
1618130001~06222004-012.jpg

COMMENTS: Satellite accumulation  
area for Building 247 (Navy - Marine  
Reserves).



DOCUMENT FILE NAME:  
1618130001~06222004.doc



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Rock Island Arsenal  
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FOS File

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DATE: June 22, 2004

TIME: 11:35 AM

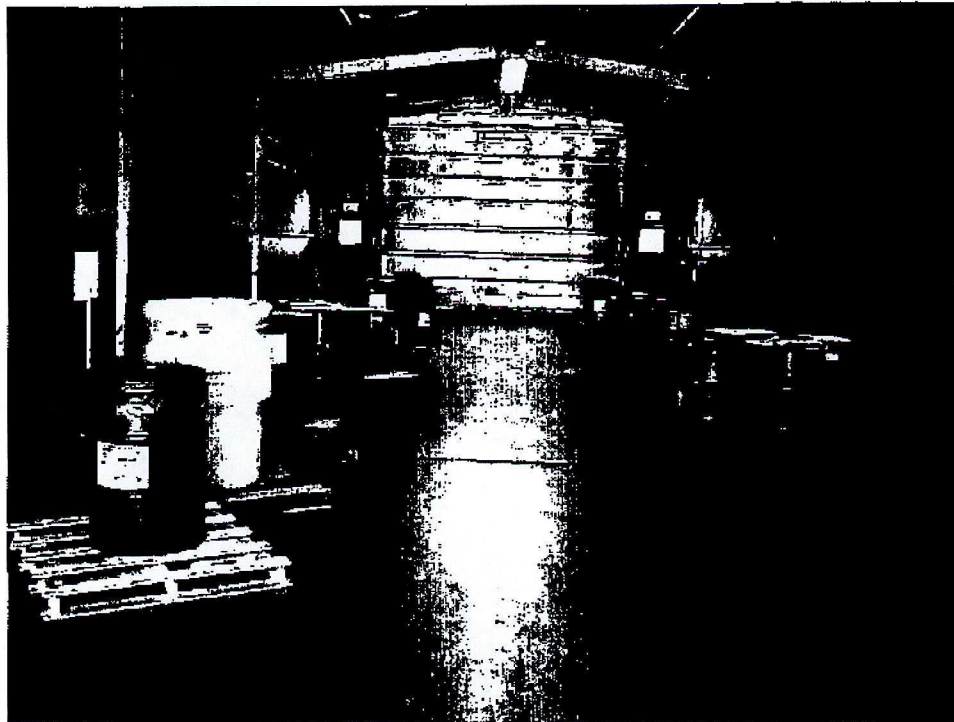
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 13

PHOTOGRAPH FILE NAME:  
1618130001-06222004-013.jpg

COMMENTS: 90-day accumulation  
area Building 242.



DATE: June 22, 2004

TIME: 11:43 AM

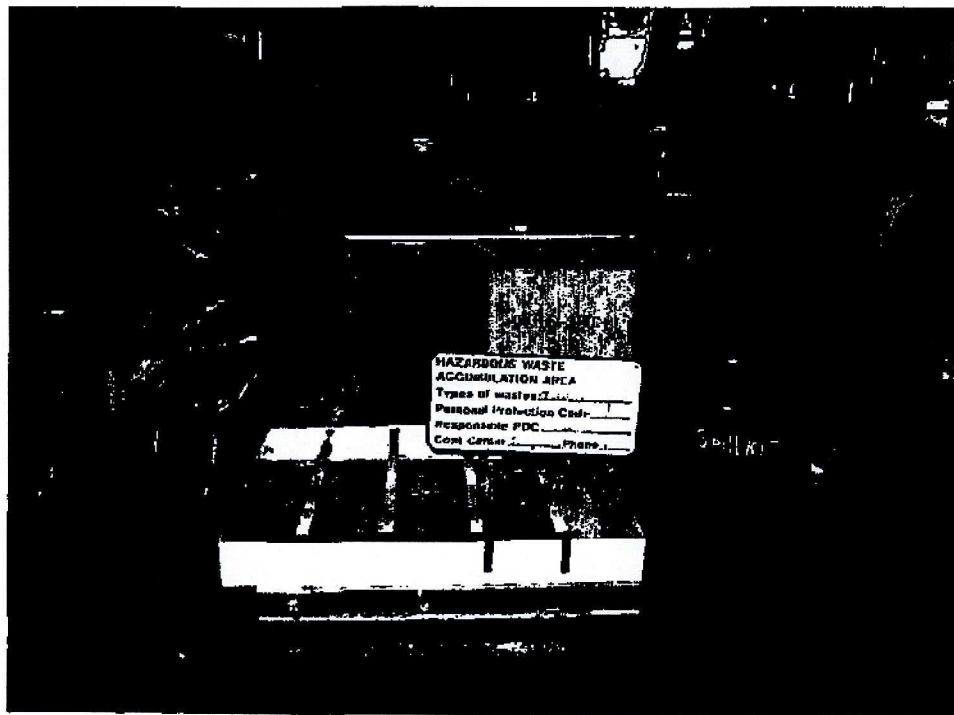
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the south.

PHOTOGRAPH NUMBER: 14

PHOTOGRAPH FILE NAME:  
1618130001-06222004-014.jpg

COMMENTS: Satellite accumulation  
area for Building 222 (Heat Treat).



DOCUMENT FILE NAME:  
1618130001-06222004.doc

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Rock Island Arsenal  
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DATE: June 22, 2004

TIME: 11:49 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 15

PHOTOGRAPH FILE NAME:  
1618130001~06222004-015.jpg

COMMENTS: Satellite accumulation  
area for Building 212 (Plating Shop).



DATE: June 22, 2004

TIME: 11:57 AM

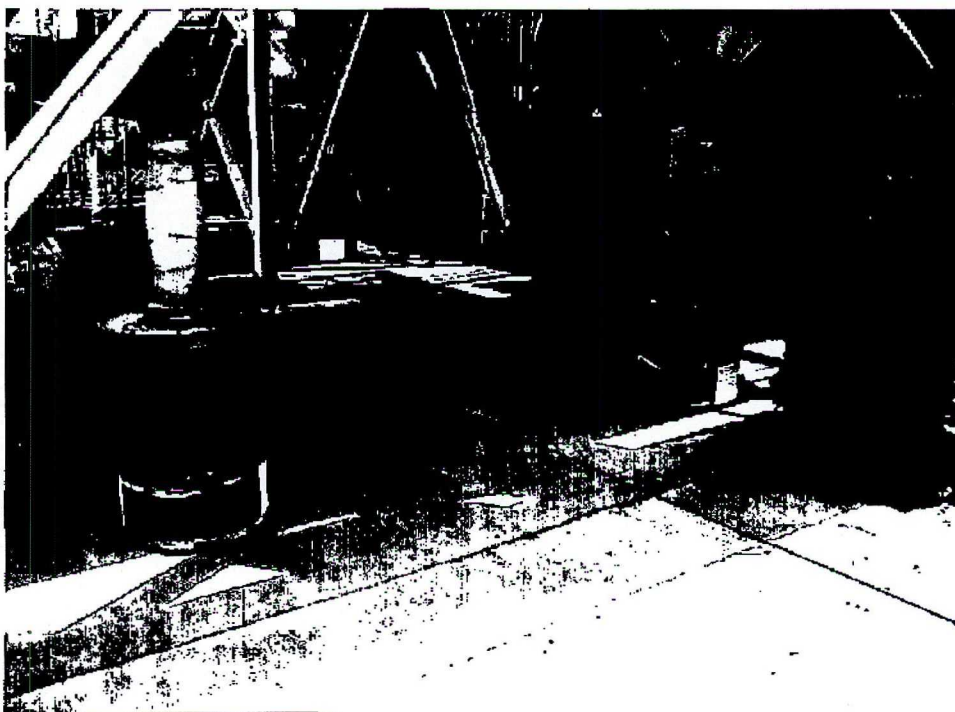
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 16

PHOTOGRAPH FILE NAME:  
1618130001~06222004-016.jpg

COMMENTS: Satellite accumulation  
area for emission control dust outside  
Building 212 (Foundry).



DOCUMENT FILE NAME:  
1618130001~06222004.doc



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Rock Island Arsenal  
IL5210021833  
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DATE: June 22, 2004

TIME: 11:59 AM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the south.

PHOTOGRAPH NUMBER: 17

PHOTOGRAPH FILE NAME:  
1618130001~06222004-017.jpg

COMMENTS: Satellite accumulation  
area for emission control dust outside  
Building 212 (Foundry).



DATE: June 22, 2004

TIME: 12:03 PM

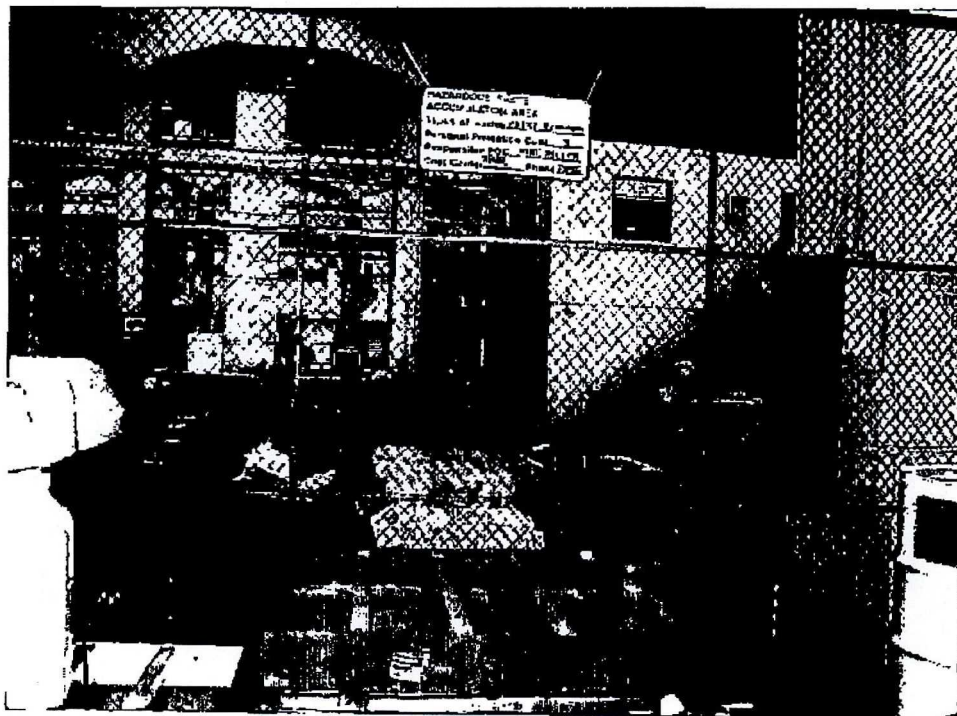
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 18

PHOTOGRAPH FILE NAME:  
1618130001~06222004-018.jpg

COMMENTS: Accumulation area for  
Building 208.



DOCUMENT FILE NAME:  
1618130001~06222004.doc

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Rock Island Arsenal  
IL5210021833  
FOS File

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DATE: June 22, 2004

TIME: 12:03 PM

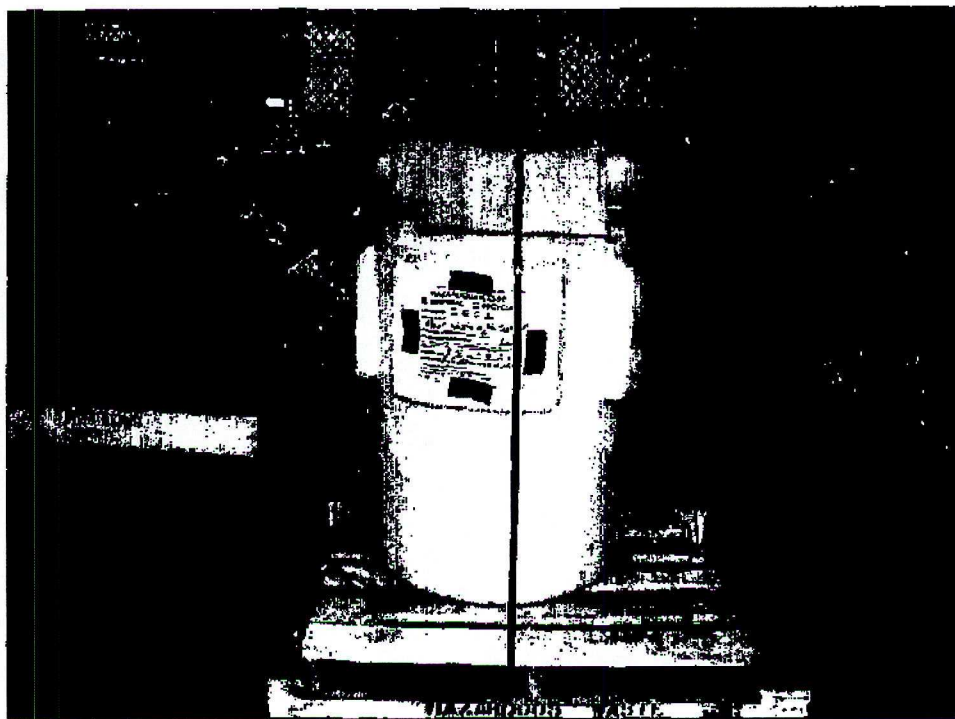
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 19

PHOTOGRAPH FILE NAME:  
1618130001~06222004-019.jpg

COMMENTS: Accumulation area for  
Building 208..



DATE: June 22, 2004

TIME: 12:11 PM

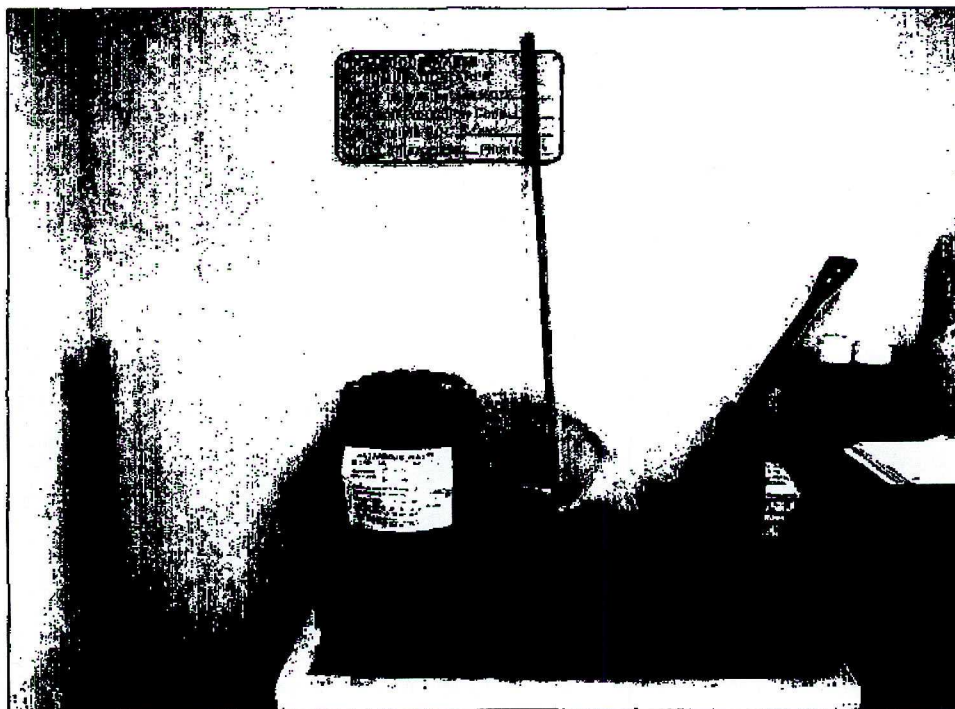
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the west.

PHOTOGRAPH NUMBER: 20

PHOTOGRAPH FILE NAME:  
1618130001~06222004-020.jpg

COMMENTS: Satellite accumulation  
area for Building 210 (Lab).



DOCUMENT FILE NAME:  
1618130001~06222004.doc



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Rock Island Arsenal  
IL5210021833  
FOS File

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DATE: June 22, 2004

TIME: 1:11 PM

PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the west.

PHOTOGRAPH NUMBER: 21

PHOTOGRAPH FILE NAME:  
1618130001~06222004-021.jpg

COMMENTS: Satellite accumulation  
area for Building 349 (Do - It -  
Yourself).



DOCUMENT FILE NAME:  
1618130001~06222004.doc

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Rock Island Arsenal  
IL5210021833  
FOS File

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DATE: June 23, 2004

TIME: 9:06 AM

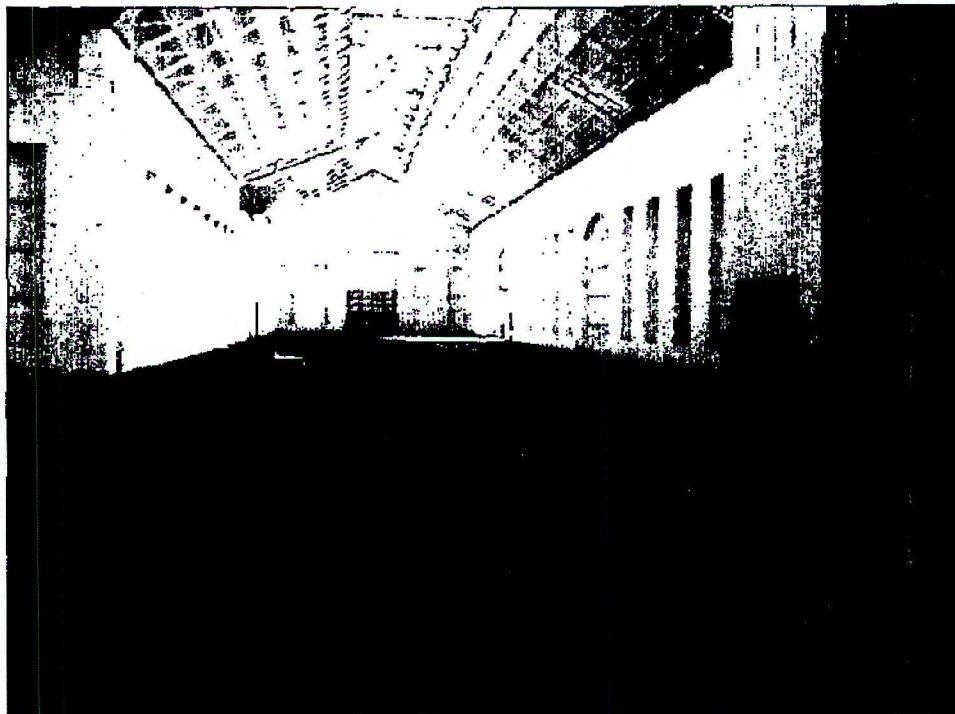
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 1

PHOTOGRAPH FILE NAME:  
1618130001~06232004-001.jpg

COMMENTS: Building 64.



DATE: June 23, 2004

TIME: 9:07 AM

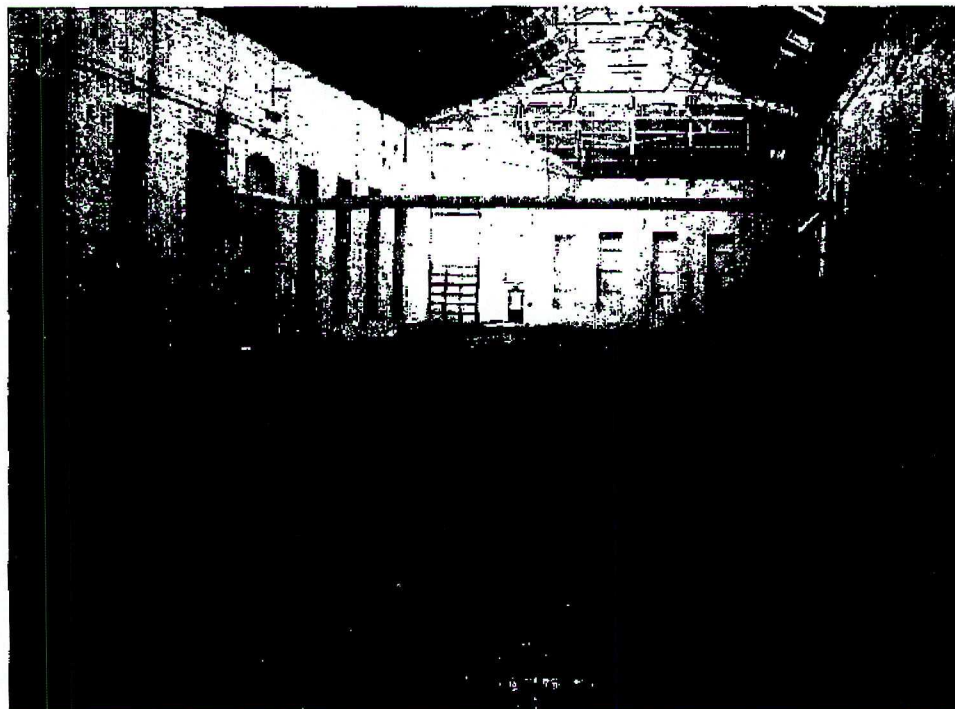
PHOTOGRAPHED BY:  
Robert J. Wagner

DIRECTION: Photograph taken  
toward the north.

PHOTOGRAPH NUMBER: 2

PHOTOGRAPH FILE NAME:  
1618130001~06232004-002.jpg

COMMENTS: Building 64.



DOCUMENT FILE NAME:  
1618130001~06232004.doc